

# **EPA Registration #8743-13**

## Heffernan, Aline

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**From:** Heffernan, Aline  
**Sent:** Monday, October 29, 2018 2:18 PM  
**To:** 'Wendy McCombie'  
**Cc:** Bain, Zeno  
**Subject:** Notification 8743-13

Wendy,

I hope you are doing well. I have your notification 8743-13, as per PRN 98-10, "Correcting typographical and printing errors in labeling as well as changes in grammar and/or phrasing that do not change how the product will be used (e.g. adding and/or changing prepositions) are permitted by not-notification provided that the use directions, signal words or requirements for child resistant packaging do not change and the format is consistent with Agency labeling requirements.". The proposed change to the label falls under a non-notification.

The action will be closed and no changes are going to be processed on the label.

If there are any other changes to the label, please make sure the product label is on 8.5 x 11 and the font is larger so it is easier to read.

Please let me know if you have any questions.

Thank you,

Aline

\*\*\*\*\*

Aline Heffernan  
Regulatory Management Branch 1  
Antimicrobials Division  
Office of Pesticide Programs  
703-347-8602

## Heffernan, Aline

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**From:** Bain, Zeno  
**Sent:** Monday, October 29, 2018 2:08 PM  
**To:** Heffernan, Aline  
**Subject:** Re: Notification

Hi Aline, I would suggest #2.

Thank you

Zeno

On Oct 29, 2018, at 1:21 PM, Heffernan, Aline <[heffernan.aline@epa.gov](mailto:heffernan.aline@epa.gov)> wrote:

Zeno,

I picked a notification out of the drawer to do and it looks like it should be a non-notification. It is reg number 8743-13 with a portal submission number of 33197. In the cover letter they say they are submitting a notification to fix a typo. However, fixing a typo like the one highlighted on the label is a non-notification.

How do you think I should move forward with this action:

1. Process it as a notification – which would involve contacting the company for a new label since they submitted one on legal sized paper with incredibly small font.
2. Process it as a non-notification – which would have me close out the action and send an email to the company saying the requested change is a non-notification and when they come in again for another action they need to send it on 8.5 x 11 sized paper and in larger font.

\*\*\*\*\*

Aline Heffernan  
Regulatory Management Branch 1  
Antimicrobials Division  
Office of Pesticide Programs  
703-347-8602

# LEWIS & HARRISON

Consultants in Government Affairs

2461 South Clark Street  
Suite 710  
Arlington, VA 22202

telephone 202.393.3903  
fax 202.393.3906

direct 202.393.3903 ext. 111  
wmccombie@lewisharrison.com

October 10, 2018

**ELECTRONIC DELIVERY**

Office of Pesticide Programs  
Document Processing Desk [NOTIFY]  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

**ATTENTION: Zeno Bain**  
**Product Manager, Team 33**  
**Antimicrobials Division**

**SUBJECT: Brainerd Chemical Company, Inc.**  
**TERRASTAT™ 22-S, EPA Reg. No. 8743-13**  
**Application for Notification per PR Notice 1998-10**  
**Minor Label Change: Correction of Typographical Error**  
**This Submission is Not Subject to PRIA Fees**

Dear Mr. Bain:

On behalf of Brainerd Chemical Company, Inc., I am submitting an application to Notify the Agency of a minor label change for TERRASTAT™ 22-S (EPA Reg. No. 8743-13). Per PR Notice 1998-10, we are correcting a typographical error that does not change how the product will be used. We are replacing an incorrect company name on page 3 with "Brainerd Chemical Company, Inc." A copy of the label with the highlighted change is included with this submission. With the exception of this correction and the addition of the assigned EPA Registration Number, no other changes have been made to the label so it is otherwise identical to that stamped-accepted on August 30, 2018

The following documents are being submitted to support the Notification for TERRASTAT™ 22-S:

- 1) Pesticide Application Form (EPA Form 8570-1); and,
- 2) Copy of the label with the change highlighted.

If you have any questions, please contact me by telephone at 202-393-3903 ext. 111 or by e-mail at wmccombie@lewisharrison.com.

Thank you very much for your cooperation.

Sincerely,



Wendy A. McCombie  
For,  
Brainerd Chemical Company, Inc.

CC: Will Crimmins  
Brainerd Chemical Company, Inc.

**DOCUMENTUM 4**



**EPA**

United States  
**Environmental Protection Agency**  
 Washington, DC 20460

- ☐ Registration  
☐ Amendment  
☒ Other Notification

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number <b>8743-13</b>	2. EPA Product Manager <b>Zeno Bain</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>TERRASTAT™ 22-S</b>	PM# <b>33</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Brainerd Chemical Company, Inc. PO Box 470010 Tulsa, OK 74147</b>  <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: MINOR LABEL REVISIONS PER PR NOTICE 1998-10****Notification of Minor Label Changes- See Cover Letter For Details**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Wendy A. McCombieDate: October 10, 2018**THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES****Section - III**

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
*Certification must be submitted		If "Yes" Unit Packaging wgt.      No. per container	If "Yes" Package wgt.      No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container	4. Size(s) Retail Container <b>No Retail Containers 1 gal, 5 gal, 15 gal, 30 gal, 55 gal, 275 gal, 330 gal, and bulk tanker or ISO</b>		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name <b>wmccombe@lewisharrison.com</b> <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b> <b>2461 S. Clark St., Ste. 710, Arlington, VA 22202</b>	Title <b>Agent for</b> <b>Brainerd Chemical Company, Inc.</b>	Telephone No. (Include Area Code) <b>202-393-3903 x 111</b>
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <u>Wendy A. McCombie</u>	3. Title <b>Agent for</b> <b>Brainerd Chemical Company, Inc.</b>	
4. Typed Name <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b>	5. Date <b>October 10, 2018</b>	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 10, 2018

Wendy A. McCombie  
Agent  
Brainerd Chemical Company, Inc.  
PO Box 470010  
Tulsa, OK 74147

Subject: Notification per PRN 98-10 – Changes to Label  
Product Name: TERRASTAT™ 22-S  
EPA Registration Number: 8743-13  
Application Date: 09/11/2018  
Decision Number: 544212

Dear Ms. McCombie:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the request is not acceptable for the following reasons:

1. The submitted label has different precautionary language than the official EPA stamped label. Any changes to the precautionary language would require a label amendment.

No further processing of this application will occur. You may submit a new application addressing the deficiencies listed above for future consideration. Our records have been updated accordingly to note that this notification is unacceptable.

If you have any questions, you may contact Jake Farley at (703) 347-0123 or via email at [Farley.jake@epa.gov](mailto:Farley.jake@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to be "Zeno Bain".

Zeno Bain, Product Manager 33  
Regulatory Management Branch I  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

## Farley, Jake

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**From:** Farley, Jake  
**Sent:** Wednesday, October 10, 2018 11:33 AM  
**To:** 'Wendy McCombie'  
**Cc:** Bain, Zeno; OPP AD Ombudsman  
**Subject:** EPA Completed Action (8743-13)  
**Attachments:** 8743-13-20181010.pdf

Good Morning,

Please see the attached letter.

Best,

Jake Farley

Jake Farley | Risk Manager | Regulatory Management Branch 1 | Antimicrobials Division  
U.S. Environmental Protection Agency, Office of Pesticides Programs  
(703)347-0123 | Farley.Jake@epa.gov



Receipt for Section 3

S: 1024586

Milestone Email: wmccombie@lewisharrison.com

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Notification

Fee For Service: ☐ Yes ☒ No

Company: 8743 BRAINERD CHEMICAL COMPANY INC

V

Risk Manager: Antimicrobials Division, Risk Management Team 33

Product #: 8743-13

Product Name: TERRASTAT 22-S

Override#:

Me Too  
Section3:

Me Too Product  
Name:

Application Date: 11-Sep-2018



OPP Rec'd Date: 11-Sep-2018



Front End Date: 11-Sep-2018



Risk Manager Send Date: 11-Sep-2018



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ eCSF Ind: ☐ SmartLabel Ind: ☐ New Ingredient: ☐

Receipt Description:

Portal submission pkg #32235 Notification of minor label revisions per PRN 98-10

Receipt Content	De
Electronic Label	

View/Edit

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

☒ Denial letter Drafted

JF

☒ Sent to zero

☐ Sent to registrant

Doc #: 544212

App DT: 4/11/2018

Sub due DT: 10/11/2018

DOCUMENTUM

# LEWIS & HARRISON

Consultants in Government Affairs

2461 South Clark Street  
Suite 710  
Arlington, VA 22202

telephone 202.393.3903  
fax 202.393.3906

direct 202.393.3903 ext. 111  
wmccombie@lewisharrison.com

September 11, 2018

**ELECTRONIC DELIVERY**

Office of Pesticide Programs  
Document Processing Desk [NOTIFY]  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

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**Product Manager, Team 33**  
**Antimicrobials Division**

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On behalf of Brainerd Chemical Company, Inc., I am submitting an application to Notify the Agency of a minor label change for TERRASTAT™ 22-S (EPA Reg. No. 8743-13). Per PR Notice 1998-10, we are correcting a typographical error that does not change how the product will be used. We are replacing an incorrect company name on page 3 with "Brainerd Chemical Company, Inc." A copy of the label with the highlighted change is included with this submission. With the exception of this correction and the addition of the assigned EPA Registration Number, no other changes have been made to the label so it is otherwise identical to that stamped-accepted on August 30, 2018

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- 2) Copy of the label with the change highlighted.

If you have any questions, please contact me by telephone at 202-393-3903 ext. 111 or by e-mail at [wmccombie@lewisharrison.com](mailto:wmccombie@lewisharrison.com).

Thank you very much for your cooperation.

Sincerely,



Wendy A. McCombie  
For,  
Brainerd Chemical Company, Inc.

CC: Will Crimmins  
Brainerd Chemical Company, Inc.

**DOCUMENTUM**




**EPA**

 United States  
**Environmental Protection Agency**  
 Washington, DC 20460

☐ **Registration**  
☐ **Amendment**  
☒ **Other Notification**

OPP Identifier Number

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4. Company/Product (Name) <b>TERRASTAT™ 22-S</b>	PM# <b>33</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Brainerd Chemical Company, Inc.</b> <b>PO Box 470010</b> <b>Tulsa, OK 74147</b>  <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
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 Signature: Wendy A. McCombie

 Date: September 11, 2018
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**Section - III**

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*Certification must be submitted			
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**Section - IV**

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Name <b>wmccombie@lewisharrison.com</b> <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b> <b>2461 S. Clark St., Ste. 710, Arlington, VA 22202</b>	Title <b>Agent for</b> <b>Brainerd Chemical Company, Inc.</b>	Telephone No. (Include Area Code) <b>202-393-3903 x 111</b>
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <b>(Stamped)</b> <div style="color: red; font-weight: bold; font-size: 1.5em; transform: rotate(-5deg); display: inline-block;">DOCUMENTUM</div>
2. Signature <u>Wendy A. McCombie</u>	3. Title <b>Agent for</b> <b>Brainerd Chemical Company, Inc.</b>	
4. Typed Name <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b>	5. Date <b>September 11, 2018</b>	



# PROCESSING REQUEST

Reg # 8743-13

Decision # 539455

Description: New Registration

**Electronic Label & Letter**  
(see PPLS):

OR

**Non Electronic  
Label & Letter**  
(Scanning required):

☐ Dated: 8/30/18

☐ Dated:

\*\*\*Only one label type should be selected\*\*\*

**Other Materials Sent** (see jacket):

☒ New CSF(s) Dated: Basic 3/2/18, Alt 3/2/18

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Zebora Johnson

Division: OCSPP/OPP/AD/RMB1

Phone: (703) 308-7-7080

Date: 9/6/18



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Antimicrobials Division (7510P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

8743-13

Date of Issuance:

8/30/18

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration  
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

TERRASTAT 22-S

Name and Address of Registrant (include ZIP Code):

Brainerd Chemical Company, Inc.  
P.O. Box 479910  
Tulsa, OK 74147

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Antimicrobials Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Zeno Bain, Product Manager 33  
Regulatory Management Branch I  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

Date:

8/30/18

2. You are required to comply with the data requirements described in the DCI Order identified below:
  - a. Peroxyacetic Acid - GDCI-063201-1125 — EPA-HQ-OPP-2009-0546
  - b. Hydrogen Peroxide – GDCI-000595-1127 – EPA-HQ-OPP-2009-0546

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Reevaluation Team Leader (Team 36): <http://www2.epa.gov/pesticide-contacts/contacts-office-pesticide-programs-antimicrobial-division>

3. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, “EPA Reg. No. 8743-13.”
4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated March 2, 2018
- Alternate CSF dated March 2, 2018

If you have any questions, please contact Zebora Johnson by phone at (703) 308-7080, or via email at [johnson.zebora@epa.gov](mailto:johnson.zebora@epa.gov).

Enclosure: Accepted Label



**TERRASTAT™ 22-S**

TERRASTAT™ 22-S IS A PEROXYACETIC ACID-BASED ANTIMICROBIAL AGENT

**ACTIVE INGREDIENTS:**  
 PEROXYACETIC ACID  
 HYDROGEN PEROXIDE  
**INERT INGREDIENTS:**  
 TOTAL

22.0%  
 5.0%  
 73.0%  
 100.0%

**ACCEPTED****08/30/2018**

Under the Federal Insecticide, Fungicide  
 and Rodenticide Act as amended, for the  
 pesticide registered under

EPA Reg. No. 8743-13

EPA Reg. No. 8743-  
 EPA Est. No. 8743-OK-001; 8743-OK-002

**DANGER - PELIGRO****KEEP OUT OF REACH OF CHILDREN****See Side Panel for Additional Precautionary Statements**

Before Using This Product, Please Read The Entire Label Carefully.

Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Manufactured By:  
**Brainerd Chemical Company Inc.**  
 427 S. Boston Ave., Suite 2100  
 Tulsa, OK, 74103  
 800-551-5128

<b>FIRST AID</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858-7378. You may also contact the poison control center at 1-800-222-1222 for emergency medical treatment information.	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>Hold eyelids open and rinse slowly and gently for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing the eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call poison control center or doctor immediately for treatment or advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>Call poison control center or doctor immediately for treatment or advice.</li> <li>Drink promptly large quantities of water.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate the use of gastric lavage.	

**For 24-hour Emergency Information CALL CHEMTREC: 800-424-9300****PRECAUTIONARY STATEMENTS****Hazards to Humans and Domestic Animals**

**DANGER: CORROSIVE.** Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. Do not breathe vapors or spray mist. Do not get in eyes, on skin, or on clothing. Wear goggles, face shield, rubber gloves and protective clothing with long sleeves when handling. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse. Do not enter an enclosed area without proper respiratory protection, or when uncoupling of product transfer hoses. Wear a NIOSH approved respirator with an organic vapor (OV) cartridge with a combination N, R or P filter with NIOSH approval number prefix TC-84A; or a NIOSH approved gas mask with a canister with NIOSH approval number prefix TC-140; or powered air purifying respirator with organic vapor (OV) cartridge and combination HE filter with NIOSH approval number prefix TC-23C.

**USER SAFETY RECOMMENDATIONS:** Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**PERSONAL PROTECTIVE EQUIPMENT**

Handlers who may be exposed to the undiluted product through mixing, loading, application, or other tasks must wear: coveralls over long-sleeved shirt and long pants, rubber gloves, chemical resistant footwear plus socks, and protective eyewear (goggles or face shield).

Handlers who may be exposed to the undiluted product through application or other tasks must wear: long-sleeved shirt and long pants, and shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product. Do not reuse them. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**PHYSICAL OR CHEMICAL HAZARDS: STRONG OXIDIZING AGENT, CORROSIVE.** Mix only with water below 140° F. Product must be diluted in accordance with label directions prior to use. This product is not combustible; however, at temperatures exceeding 165°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion. Keep out of sunlight to better preserve active ingredients.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish, shrimp, clams, oysters, and aquatic invertebrates. Caution must be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of the National Pollution Discharge System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage plant authority.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**Storage:** Never return this product to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents, and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of a decomposition, isolate container, spray container with cool water and dilute this product with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. **Procedure for Leak or Spill:** Stop leak if this can be done without risk. Shut off ignition sources; no flames, smoking, flares, or spark producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material must not enter confined spaces.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or Hazardous Waste representative at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods of disposal may vary by location, regulatory agencies must be contacted prior to disposal. This product which is to be discarded, must be disposed of as hazardous waste after contacting the appropriate local State or Federal agency to determine proper procedures.

**Container Disposal: (Containers greater than 5 gallons)** Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Offer for recycling, if available. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

**Container Disposal: (Containers equal to or less than 5 gallons)** Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat the procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

**Container Disposal: (Stainless steel containers - tank trucks):** Return for reuse. Refill the container with pesticide only. Do not reuse this container for other purposes.

UN3109, Organic peroxide type F,  
liquid (peroxyacetic acid, Type F,  
stabilized (<43%)), 5.2 (8)

Density (lbs/gal): 9.40

Net Contents: \_\_\_\_\_

Lot. No: \_\_\_\_\_

Exp. Date: \_\_\_\_\_

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Note: All volumes given in ounces are fluid ounces. When used according to the directions for use, this product is compatible with plastic, stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

**Note:** All volumes given in ounces are fluid ounces. When used according to the directions for use, this product is compatible with plastic, stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

#### ANTIMICROBIAL RINSE OF PRECLEANED OR NEW RETURNABLE OR NON-RETURNABLE CONTAINERS

To reduce the number of nonpathogenic beverage spoilage organisms, use 0.7 to 7.2 fluid ounces of product per 5 gallons of water. This provides 265 to 2700 ppm peroxyacetic acid and 62 to 628 ppm hydrogen peroxide. After applying the antimicrobial rinse, allow containers to drain thoroughly. Optional rinse with sterile or potable water.

#### REVERSE OSMOSIS (RO), ULTRA FILTRATION (UF) AND OTHER MEMBRANE CLEANING

This product may be used in the cleaning of ultra-filtration (UF) and reverse osmosis (RO) membranes and their associated piping systems. This product is not for use in kidney dialysis equipment. Do not use the intermittent or continuous dosing methods for non-RO food or drinking water contact applications. This product may not totally eliminate all vegetative microorganisms in RO or NF or UF membranes and their associated piping systems due to their construction or assembly, but can be relied upon to reduce the number of microorganisms to acceptable levels when used as directed. Prior to using this product check with membrane manufacturer to confirm compatibility of membranes with various types or concentration of peroxyacetic acid solutions.

**Batch Cleaning of NF, UF and RO Systems:** Isolate incompatible equipment, such as carbon filters and ion exchangers. Clean system with an appropriate cleaner and follow with RO permeate water or potable water. Remove mineral deposits if necessary with an acidic cleaner, and rinse as before. Fill entire system with water and add up to 0.28% of this product by volume. This will equal 680 ppm peroxyacetic acid and 158 ppm hydrogen peroxide. Recirculate the cleaning solution through the piping and membrane system at 20° C for 10 minutes minimum, or up to 4 hours, depending on the severity of cleaning to be done. Open and close process valves and solenoids to be sure all parts are in contact with the solution. Rinse the system with RO permeate or potable water until residual peroxygen concentration is below 1 ppm.

**Continuous or Intermittent Addition:** For continuous addition (dosing) for RO systems, use 2-5 ppm of active peroxyacetic acid, which equals 1-2.6 fl. oz. of this product per 1000 gallons of process water. For occasional intermittent feed, do not exceed 93 ppm active peroxyacetic acid, which equals 0.5 fl. oz. of this product per 10 gallons of feed water. Continuous or intermittent dosing of this product is not allowed for use in NF or UF systems for on-line food or drinking water applications.



## **BIOFOULING CONTROL IN PULP, PAPER AND PAPERBOARD MILL AND WATER SYSTEMS**

Not for use in California

For use in the manufacture of paper and paperboard intended for food or nonfood contact. This product can be used to control bacteria and fungi in paper, paperboard or non-woven process water and influent water systems. Suitable dosing points include but are not limited to: stock chests, pulpers, the white-water loop, white water storage systems and influent water streams.

**Influent Water Systems:** This product should be fed continuously to incoming fresh water streams (non potable use only) at dosages ranging from 0.08- 1.4 lbs (1-13.7 fl. oz.) of this product per 1000 gallons of raw or process water (2.0-35 ppm peroxyacetic acid). Adjust dosage as necessary to maintain microbiological control.

### **Mill Process Waters:**

**Intermittent Feed** - This product may be fed intermittently (for example: 2-3 hours per 8 hour shift) at dosages ranging from 0.35 lbs to 0.84 lb (4.9-11.2 fl. oz.) of this product per ton (dry basis) of pulp or paper produced. This dosage is equivalent to 37-90 ppm peroxyacetic acid. Repeat as necessary when the peroxyacetic acid concentration reaches less than 2 ppm.

**Continuous Feed** - This product should be fed continuously at dosages ranging from 0.08-0.84 lbs (1-11.2 fl. oz.) of this product per ton (dry basis) of pulp or paper produced. This dosage is equivalent to 8.0-90 ppm peroxyacetic acid.

**Shock (slug) Dose** - This product may be used to shock dose systems requiring a high level of biofouling control. Use rates ranging from 0.7-5.6 lbs (9.5-75.4 fl. oz.) of this product per ton (dry basis) of pulp or paper produced may be necessary. This dosage is equivalent to 75-600 ppm peroxyacetic acid. Shock dose every 1-3 hrs as necessary until biofouling control is evident. Thereafter, revert to continuous or intermittent feed methods.

## **CONTROL OF SLIME FORMING BACTERIA AND BIOFOULING IN ONCE-THROUGH AND RECIRCULATING COOLING WATER (COOLING TOWERS, EVAPORATIVE CONDENSERS, AIR WASHERS) AND ORNAMENTAL OR RECREATIONAL WATER FEATURES**

Severely fouled systems must be cleaned before adding this product. This product must be added in the water system directly, and not mixed with any other chemicals or additives. Never add this product into any feeding device, such as shot feeders, filter housings, by-pass feeders, or miscellaneous piping of any kind, because dangerous acute decomposition can occur. Discontinue the use of chlorine or bromine products prior to using this product. Contamination with other chemicals could result in product decomposition. Add this product to only water at a point in the system where uniform mixing and even distribution will occur. For shock (slug) treatment for moderately to severely fouled systems add 3.7-14 fl. oz. of this product per 1000 gallons of process water (7-27 ppm peroxyacetic acid). Repeat as necessary until microbiological control is evident. Thereafter, to maintain control use (1-5.2 fl. oz.) of this product per 1000 gallons of process water (2-10 ppm of peroxyacetic acid) as a continuous treatment method. Continuous dosing methods usually require 1-3.7 fl. oz. per 1000 gallons of water (2-7 ppm peroxyacetic acid) to achieve adequate results. Intermittent dosing treatment usually require dose cycles of a minimum once per every other day, up to 6 times per 24 hours. Recommended rates for intermittent dose cycles are 3.7-7 fl. oz. of this product per 1000 gallons of process water (7-14 ppm peroxyacetic acid). **CLEANING:** To remove sessile bacteria from cooling systems it is necessary to clean slime and slime-forming bacteria from the surfaces of all areas of water contact. This can be accomplished by treating the recycled water with 26.7-80 fl. oz. of this product per 1000 gal of water (50-150 ppm active peroxyacetic acid) for 4-8 hours during normal tower operating cycles. This procedure can be used for online or offline cleaning. When finished, bleed down the system until the PAA level is <5-10 ppm, then normal chlorine or bromine or PAA treatments can begin. This treatment must be done at least once or twice each year depending on exposure conditions.

**Air Washers:** This product may be used to control bacteria and biofouling in industrial air washing/scrubbing systems. The air washer must have operational and effective mist elimination systems. Prior to use of this product, heavily fouled systems must be pre-cleaned using the appropriate cleaner. Continuous dosing methods will require 2-7 ppm and intermittent dosing methods require 7-14 ppm (as peroxyacetic acid), as described in the previous 2 paragraphs, depending on the type of system and the level of microbiological control desired.

**Evaporated or Condensed Water:** This product may be used to treat SWEET or COW water (e.g. condensate of whey) collected from evaporated or condensing water systems in food or dairy plants. Continuous dosing methods will require 2-7 ppm and intermittent dosing methods require 7-14 ppm (as peroxyacetic acid) as described in the previous paragraph, depending on the type of system and the level of microbiological control desired.

## **MICROBIAL CONTROL IN EFFLUENT TREATMENT SYSTEMS**

Use this product to treat sewage and wastewater effluent systems associated with public and private wastewater treatment plants. This product may be applied alone at any point in the treatment train, such as debulking control, or may effectively be used in conjunction with other systems, such as Ultra Violet (UV) light. Doses for UV systems will typically be 1-4 ppm (as active PAA). Initially apply this product at the rate of 2-63 gal per million gallons of water to be treated (0.5-15 ppm as peracetic acid). The PAA dosage will depend on the quality of water, contact (holding) time, and the degree of microbial control necessary. The PAA concentration will rapidly decline after treatment, but the maximum amount of PAA that may be discharged into the receiving body of water is limited to 1 ppm as active PAA, or as required for local discharge requirements. Consult your Enviro Tech representative for recommendations regarding an accurate test kit or on-line analyzer.

## **OIL, GAS AND SECONDARY OIL RECOVERY SYSTEMS, DRILLING MUDS AND PACKING FLUID**

This product may be used to treat water used in primary or secondary oil and gas recovery systems to control anaerobic sulfide-forming bacteria, aerobic slime-forming bacteria. This product may be used in fresh or recycled water, secondary recovery systems, muds or fluids. This product controls biofilm and slime deposits on products associated with oilfield and gas field systems which are susceptible to contamination. It also controls slime deposits downhole in water-bottoms. Add sufficient amount of this product to achieve satisfactory biological control. Initial recommended dosing levels of 5 to 100 ppm as active peroxyacetic acid are suggested. A dosage of 2.6 fl. oz. per 1000 gallons of water yields approximately 5 ppm of peroxyacetic acid.

## **TREATMENT OF FRUIT AND VEGETABLE PROCESS WATER SYSTEMS**

This product can be used in water or ice that contacts raw or fresh, post-harvest or further processed fruits and vegetables for the control of spoilage and decay causing bacteria and fungi (non-public health microorganisms) in commercial operations and packinghouses.

**Batch or Spray System Processes:** Fill vessel containing fruits and vegetables with known amount of water. Ensure that water is circulating in vessel if using the submersion method. Add this product to no more than 350 ppm residual peroxyacetic acid to the use solution in accordance with FCN #1823. This can be accomplished by initially adding 1.8 fl. oz. per 10 gallons of water. The recommended concentration is between 30-300 ppm as peroxyacetic acid (0.16-1.6 fl. oz. per 10 gallons of water). The final concentration necessary to accomplish the intended task will vary from plant-to-plant. The fruits and vegetables can be sprayed or submerged (dipped) in the resulting solution. It is also recommended to apply this product during the washing, chilling, or physical cleaning processes, including the roller-spreader, washer or brush washer manifold, dip tank, or sorting processes. Contact time of 60 seconds is recommended to insure efficacy. A potable water rinse is not required.



#### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and Restricted-Entry Interval (REI). The requirements in this box only apply to the uses of this product that are covered by the Workers Protection Standard. There is a restricted entry of zero (0) hours for this product.

#### AGRICULTURAL or HORTICULTURAL USES

There is a Restricted-Entry-Interval of zero (0) hours after the use of this product. Upon soil contact this diluted product decomposes rapidly to oxygen, carbon dioxide and water. This product may be harmful to fish if exposed on a continuous basis at concentrations of 1 ppm or more of active peroxyacetic acid. Meter this product into pressurized pipes using a plastic or stainless steel injection/backflow device installed far enough upstream from the equipment to ensure thorough mixing. For open flowing bodies of water, apply this product as far upstream as possible to allow adequate mixing prior to the flow entering any larger body of water. If open pouring of this product is required pour product as close to the surface of the water as possible to reduce odor exposure. Spray lines, hoses and tank must be clean before using this product. Make sure no iron or yellow metals are in contact with the spray solution at any time. Only stainless steel or plastic contact materials may be used in your spray rig.

[Compatibility: This product is compatible as a direct injection or tank-mix with many commonly used pesticides, fertilizers, adjuvants and non-ionic surfactants but has not been fully evaluated with all of these. Do not direct inject or tank mix this product in to the irrigation system or in spray tank with pesticides, surfactants or fertilizers before conducting a compatibility test to show it is physically compatible, effective and noninjurious under your use conditions. Do not tank mix this product with copper or other pesticides containing metals at a dilution rate stronger than 1:100.

To ensure compatibility, evaluate them prior to use as follows: Using a suitable container, add proportional amounts of product to water. Add wettable powders first, followed by water dispersible granules, then by liquid flowables and lastly, emulsifiable concentrates. Mix thoroughly and let stand for at least five minutes. If the combination stays mixed or can be remixed, it is physically compatible. Test the combination on a small portion of the crop to be treated to ensure that a phytotoxic response will not occur as a result of application.]

**Treatment of Agricultural or Irrigation Water Systems (sand filters, humidification systems, storage tanks, ponds, reservoirs, canals):** For the control of sulfides, odor, slime and algae in water systems, apply this product at 2-10 ppm active peroxyacetic acid. This feed rate equals 10.5-53.4 fl. oz. per 10,000 gallons of water. Repeat dose as necessary to maintain control, which will vary with seasonal conditions. For prevention of algae, some systems may require continuous low level dosing during warm sunny periods (2-5 ppm peroxyacetic acid).

**Drip Irrigation Systems:** To clean slime and algae from drip system filters, tapes and emitters, meter this product at the rate of 5.2-10.5 fl. oz. per 1000 gallons of water (10-20 ppm peroxyacetic acid). When required during normal irrigation cycles, use this product at the recommended dose for a minimum of 30 minutes. After an irrigation cycle do not flush the lines.

**Greenhouses:** This product can be used to suppress/control algae and slime formations in and around greenhouses. For normal use in various process, irrigation or sprinkler water systems, this product may be used at 1:60,000 to 1:7300 dilutions (4-33 ppm as peroxyacetic acid). Heavily fouled systems, such as evaporative coolers or irrigation/drip lines may need shock doses of up to 100 ppm as peroxyacetic acid (1:2400 dilution).

**Soil Applications:** Use this product at 11.7-23.4 fl. oz. per 100 gal of water (220-440 ppm active peroxyacetic acid) for the control of soil-borne diseases such as Fusarium, Phytophthora, Pythium, Verticillium, Thielaviopsis, and Rhizoctonia. This product can be applied by drench, flood, drip or sprinkler irrigation systems. Best results may be obtained by application prior to and during the seeding or transplant operations. Wait one day before inoculating the soil with beneficial microbes.

**Foliar Applications:** This product may be used to cure or prevent bacterial and fungal diseases on growing agricultural crops, including all grains, herbs, spices, row crops, berries, fruit and nut trees, vines (such as grapes) and tobacco. Typical use rates are 3.9-35.4 fl. oz. of this product per 100 gal of water (73.4-663 ppm active peroxyacetic acid) applied at 30-100 gal of mixed solution per acre of foliage. Curative (or rescue) treatment requires the lower dilution rates, while preventative treatments use the higher dilution rates. Apply curative treatments for 2-3 days and then resume weekly preventative treatments thereafter. Good coverage and wetting of the foliage are required. Not all plant diseases have been tested, but some of the common diseases controlled are: Alternaria spp., Anthracnose, Aphanomyces, Bacterial Blight, Black Spot, Botrytis (gray mold), Brown Spot, Copper Spot, Dollar Spot, Early and Late Blights, Erwinia spp. (such as bacterial wilt), Fairy Ring, Fusarium Root Rot and Blight, Fruit, Black, Brown, Stem and Sour Rots, Leaf and Bacterial Spots, Plasmopara, Powdery and Downy mildews, Phytophthora Blight/Rots, Pink Snow Mold, Pseudomonas and Xanthomonas spp. (such as bacterial angular leaf spot, bacterial leaf spec, black soft rot), Pythium spp., Rhizoctonia spp., Rusts, Scabs, Scum, Slime Molds, Smut, Summer Patch, Stripe Smut, Take-all Patch, and Thielaviopsis.

A nonionic spreader (surfactant) adjuvant may be used. Contact your local supplier or farm supply.

## Johnson, Zebora

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**From:** Wendy McCombie <wmccombie@lewisharrison.com>  
**Sent:** Wednesday, August 22, 2018 11:40 AM  
**To:** Johnson, Zebora  
**Cc:** Eliot Harrison  
**Subject:** RE: Acute Tox Review for PRIA 8743-RG  
**Attachments:** 8743-RG\_TERRASTAT-22-S\_LABEL\_21AUG2018.pdf

Hello Zebora -

Thank you very much for the acute tox review. Please find attached a PDF copy of the revised Terrastat 22-S label. All of the requested changes with regard to the First Aid and Precautionary Statements have been made.

With respect to the comment pertaining to the Restricted Use Pesticide, the requirement to wear gloves and protective eyewear during the use of the product will mitigate against any potential skin and eye irritation hazards. In this regard, the products are no different than numerous antimicrobial products that are Category I for skin and eye irritation and are not classified as Restricted Use pesticides. The basis for not classifying products that are corrosive to skin and eyes as Restricted Use is the regulation in 40 CFR 152.70 (e) (1) which states: if "the product should be considered for restricted use classification, the Agency will then determine if additional labeling language would be adequate to mitigate the identified hazard(s) without restricted use classification. If the labeling language meeting the criteria specified in paragraph (e)(2) of this section, the product not be classified for restricted use." Clearly, the skin and eye production on the labels for the subject products will mitigate any eye and skin exposure concerns.

No Child-Resistant Packaging certification should be necessary since Terrastat 22-S is an industrial use product, not a residential product.

If there are any additional changes that need to be made please let me know so we can revise the label accordingly.

Best regards,

Wendy A. McCombie  
Senior Associate  
Lewis & Harrison, LLC  
2461 South Clark Street, Suite 710  
Arlington, VA 22202  
phone: 202-393-3903x111 or 571-306-1308 (Fridays)  
fax: 202-393-3906  
e-mail: [wmccombie@lewisharrison.com](mailto:wmccombie@lewisharrison.com)  
website: [www.lewisharrison.com](http://www.lewisharrison.com)

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**From:** Johnson, Zebora [mailto:Johnson.Zebora@epa.gov]  
**Sent:** Tuesday, August 21, 2018 1:34 PM  
**To:** Wendy McCombie  
**Subject:** Acute Tox Review for PRIA 8743-RG

Good Afternoon Wendy:

I have enclosed a copy of the Acute Tox review for the above PRIA action.

Regards

Zebora

*Zebora M. Johnson  
Registration Risk Manager  
Antimicrobials Division  
Arlington Va. 22202  
Phone (703) 308-7080*

<mailto:johnson.zeboram@epa.gov>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**MEMORANDUM**

8/16/2018

**SUBJECT:** Acute Toxicity Review for Terrastat 22-S, EPA Reg. No.: 8743-RG

**FROM:** Joseph Williams Jr., Ph.D.  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**THRU:** Jenny Tao, Senior Scientist/Team Leader (Acute Toxicology)  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**TO:** Zeno Bain, PM Team 33 / Zebora Johnson  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

Registrant: Brainerd Chemical Company, Inc.		
Decision No.: 539455	Submission No.: 1017176	E-Sub No.: 27463
DP No.: 446590		Action Code: A532
MRID No(s): N/A		

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
063201	79-21-0	Peroxyacetic Acid	22.0
000595	7722-84-1	Hydrogen Peroxide	5.0
		Other Ingredients	73.0
		Total	100%

## **I. BACKGROUND**

The Registrant, Brainerd Chemical Company, Inc., has submitted an application for the pesticide registration of their product: *Terrastat 22-S*, EPA Reg. No. 8743-RG, for which the registrant is claiming substantially similarity in composition and labeling to *Perasan OG*, EPA Reg. No. 63838-20. This is an end-use product, intended for antimicrobial use in industrial and agricultural applications.

## **II. FINDINGS/CONCLUSIONS**

The proposed product is substantially similar to *Perasan OG*, EPA Reg. No. 63838-20. The registrant is citing the acute toxicity profile of *Perasan OG*, EPA Reg. No. 63838-20 to support the registration of the proposed product.

The acute toxicity profile for the cited product *Perasan OG*, EPA Reg. No. 63838-20 (DP424514) was extrapolated from EPA Reg. No. 90924-1 to satisfy acute toxicity data requirements at the time of its registration.

The acute toxicity profile of *Terrastat 22-S*, EPA Reg. No. 8743-RG, is currently:

<b>Study</b>	<b>MRID</b>	<b>Toxicity Category</b>	<b>Status</b>
Acute Oral Toxicity	N/A	III	Cited
Acute Dermal Toxicity	N/A	II	Cited
Acute Inhalation Toxicity	N/A	II	Cited
Primary Eye Irritation	N/A	I	Cited
Primary Skin Irritation	N/A	I	Cited
Dermal Sensitization	N/A	Nonsensitizer	Cited

## **III. PRODUCT LABELING**

1. Signal Word: DANGER
2. The statement, "Keep Out of Reach of Children (KOROC)", is required. It should appear immediately above the front-panel signal word "DANGER".
3. The Agency's Label Review Manual (<https://www.epa.gov/sites/production/files/2017-09/documents/lrm-complete-aug-2017.pdf>) indicates the following human-hazard precautionary statements:

### **PRECAUTIONARY STATEMENTS**

Hazards to Humans and Domestic Animals

**DANGER CORROSIVE.** Causes permanent, irreversible eye damage and skin burns. May be fatal if absorbed through skin or inhaled. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Do not breathe vapors or spray mist. Wear protective eyewear such as goggles, face shield, or safety glasses. Coveralls worn over long-sleeve shirt and long pants, socks, chemical-resistant footwear, chemical-resistant gloves (Barrier Laminate, or Butyl Rubber, or Neoprene Rubber, or Polyvinyl Chloride (PVC), or Viton, selection Category C). Wear a NIOSH-approved particulate filtering facepiece respirator with any N, R, or P filter with NIOSH-approval number prefix TC-84A; or a NIOSH approved gas mask with a canister with NIOSH approval number prefix TC-140; or powered air purifying respirator with organic vapor (OV) cartridge and combination HE filter with NIOSH approval number prefix TC-23C. Do not enter an enclosed area without proper respiratory protection, or when uncoupling of product transfer hoses. Do not take internally. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Follow manufacturer's instructions for cleaning/maintaining PPE. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product. Do not reuse them. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### 3. FIRST AID:

#### **If in Eyes:**

- Hold eye open and rinse slowly and gently with water for 10-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

#### **If on Skin or Clothing:**

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment.

#### **If Inhaled:**

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferable mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment.

#### **If Swallowed:**

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip one or two glasses of water if able to swallow.
- Do not induce vomiting unless told to do so, by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.



**NOTE TO PHYSICIAN:**

Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858-7378. You may also contact the poison control center at 1-800-222-1222 for emergency medical treatment information.

This product meets the Agency requirements for Restricted-Use Classification based on data that place it in toxicity category I for primary eye irritation. In lieu of assigning the product Restricted-Use classification, the product manager may consider alternatives such as face shield or goggles (to mitigate the identified hazards). Restricted-Use requirements vary depending upon use sites, e.g., institutional use, residential use, etc. Please refer to the 40 CFR §152.170 for information on Restricted-Use products.

Based upon data placing it in toxicity category I for primary eye irritation, this product meets the Agency requirements for Child-Resistant Packaging (CRP). However, the Agency does not require products that are assigned Restricted-Use status to be placed in CRP in addition to Restricted-Use Classification. CRP requirements vary depending upon use sites, e.g., institutional use, residential use, etc. Please refer to the 40 CFR, §157.22 and 157.24 for CRP requirements and exemptions.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**MEMORANDUM**

8/22/2018

**SUBJECT:** Product Chemistry Review for **TERRASTAT 22-S**, EPA Reg. No.: **8743-RG**

**FROM:** B.A. Averill  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

Peer Reviewer: Joseph Williams Jr., PhD (for Karen P. Hicks)

**THRU:** Karen P. Hicks, Team Leader  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**TO:** Zeno Bain, PM Team 33 / Zebora Johnson  
Regulatory Management Branch select  
Antimicrobials Division (7510P)

Registrant: Brainerd  
Chemical Company, Inc.  
Action code: A532  
Agency Due Date:  
6/1/2018  
DP No.: 446589  
Submission No.: 1017176  
E-Sub No.: 27463  
Classification: EP  
Process: Nonintegrated  
system  
Pesticide type:  
Antimicrobial

MRID(s): 50543001, 50543002, 50543003, 50543004

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
063201	79-21-0	Peroxyacetic Acid	22.0%
000595	7722-84-1	Hydrogen Peroxide	5.0%
		Other Ingredients	73.0%
		Total	100%
Comments/Molecular Structure: CH <sub>3</sub> CO <sub>3</sub> H (molecular formula for peroxyacetic acid); H <sub>2</sub> O <sub>2</sub> (molecular formula for hydrogen peroxide).			

## I. BACKGROUND

The Registrant, Brainerd Chemical Company, Inc., has submitted a pesticide registration for their product: TERRASTAT 22-S, EPA Reg. No. 8743-RG. This non-integrated, end-use, non-food use product is formulated to be an antimicrobial agent.

## II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (3/2/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed CSF BASIC, (3/2/2018) Alternate CSF (3/2/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label (3/2/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF	--	
Comments: None.		

## III. FINDINGS

### a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)			Nominal	Upper limit	Lower limit
Peroxyacetic Acid			22.0%	22.66%	21.34%
Hydrogen Peroxide			5.0%	5.25%	4.75%
			YES	NO	N/A

1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>	<input type="checkbox"/>	N/A
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



#### **IV. Additional Findings**

1. The data submitted for the Group A guidelines are acceptable, except that no data was provided for guideline 830.1900 (submittal of samples).
2. Compared to the basic CSF (dated 03/02/2018), the alternate CSF (dated 03/02/2018) lists a different purity and an additional supplier for the source material of the active ingredient (hydrogen peroxide). The nominal concentration of the [REDACTED] is varied to make up for the 100% accountability. The other ingredients on both CSFs share the same nominal concentrations and certified limits, and the same suppliers for their source materials.
3. The one-year "storage stability" and "corrosion characteristics" studies are in progress.
4. The term "Other Ingredients" (instead of "Inert Ingredients") should be used on the product label.

#### **V. Conclusion**

The proposed basic and alternate CSFs (dated 03/02/2018) are acceptable. The guideline (830.1900, Submittal of samples) was not addressed. The data submitted for the other Group A guidelines are acceptable. The one-year "storage stability" and "corrosion characteristics" studies are underway. The data submitted for the Group B guidelines are acceptable.

**VI. Table A:**  
**Series 830 guidelines – Group A**

OCSPP#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50543001
830.1600	Description of materials	Acceptable	50543001
830.1620	Description of production process	Not applicable, non-integrated	N/A
830.1650	Description of formulation process	Acceptable	50543001
830.1670	Discussion of formation of impurities	Acceptable	50543001
830.1700	Preliminary analysis	Not applicable, non-integrated	N/A
830.1750	Certified limits	Acceptable	MRID 50543001, Basic CSF (dated 03/02/2018) and Alternate CSF (dated 03/02/2018)
830.1800	Enforcement analytical method	Acceptable	50543002
830.1900	Submittal of samples	Data gap	No data submitted



**VII. Table B: Series 830 guidelines – Group B**

OCSPP#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Colorless	Acceptable	50543003
830.6303	Physical state	Liquid	Acceptable	50543003
830.6304	Odor	Strong odor	Acceptable	50543003
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGA	Waived	50543004
830.6314	Oxidation/Reduction	The product is compatible with water, monoammonium phosphate and powdered iron, but not compatible with potassium permanganate.	Acceptable	50543003
830.6315	Flammability	Flash point: 64.4°C	Acceptable	50543003
830.6316	Explosibility	Product does not contain explosive ingredients	Waived	50543004
830.6317	Storage stability	The study is in progress	In progress	50543004
830.6319	Miscibility	Product not mixed with organic solvents	Waived	50543004
830.6320	Corrosion characteristics	The study is in progress	In progress	50543004
830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Waived	50543004
830.7000	pH	-1.66 at 25°C (neat sample)	Acceptable	50543003
830.7050	UV/Visible absorption	Not required for MUP or EP	Not applicable	N/A
830.7100	Viscosity	2.360 mm <sup>2</sup> /s (22°C), 1.424 mm <sup>2</sup> /s (44°C)	Acceptable	50543003

OCSP#	Name	Study Findings/Comment	Status	MRID
830.7200	Melting point	Not required for MUP or EP	Not applicable	N/A
830.7220	Boiling point	Not required for MUP or EP	Not applicable	N/A
830.7300	Density/relative	1.119 g/mL	Acceptable	50543003
830.7370	Dissociation constants in water	Not required for MUP or EP	Not applicable	N/A
830.7520	Particle size	Not required for MUP or EP	Not applicable	N/A
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Not applicable	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP	Not applicable	N/A
830.7950	Vapor pressure	Not required for MUP or EP	Not applicable	N/A

# PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 3/13/18

Experts In-Processing Signature: MP Date 3/26/18 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date

EPA Reg. Number: <u>8743-RG</u>		EPA Receipt Date: <u>3/13/18</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A)	yes X	no 			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)			yes 	no 	
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
5	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
	a) Selective Method (Fee category experts use)	yes X	no 			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X



9	If applicable for conventional applications, <u>reduced risk rationale</u>			
10	<u>Required Data</u> and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			
<p><b>Comments:</b></p> <p>Documentation: pass  - required forms are complete</p> <p>Inerts: pass  - inerts approved for feed use in antimicrobial formulation;</p> <p>PRN 11-3: pass  - MRID: 605430</p> <p>overall status: pass</p> <p>HJ 3/27/18</p>				

\* N/A – Not Applicable

#### Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### **Conventional New Product Applications**

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)



3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

## A540 - New end use product.

- Must submit or reference Group A and B product chemistry, toxicity, and/or efficacy data for each proposed product.
- Data waivers may be requested. Chemistry data on the TGAI in addition to the EP is required if an unregistered source is used.

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAI)

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.1550	Product Identity & Composition	X		
830.1600	Description of materials used to produce the product	X		
830.1650	Description of formulation process	X		
830.1670	Discussion on the formation of impurities	X		
830.1700	Preliminary analysis	X		
830.1750	Certified limits (158.345)	X		
830.1800	Enforcement analytical method	X		

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted	MP Data Submitted	TGAI Data Submitted
830.6302	Color	X		
830.6303	Physical State	X		
830.6304	Odor	X		
830.6313	Stability to normal and elevated temperatures metal and metal ions			
830.6314	Oxidation/Reduction (Chemical incompatibility)	X		
830.6315	Flammability	X		
830.6316	Explosibility	X		
830.6317	Storage stability*	X		
830.6319	Miscibility	X		
830.6320	Corrosion Characteristics*	X		
830.6321	Dielectric Breakdown Voltage	X		
830.7000	pH	X		
830.7050	UV/ Visible Absorption			
830.7100	Viscosity	X		
830.7200	Melting Point			
830.7220	Boiling Point			
830.7300	Density	X		
830.7370	Dissociation Constant			
830.7550	Partition Coefficient			
830.7840	Water Solubility			
830.7950	Vapor Pressure			

Grayed out = data not required

\*May not be included with initial application

## A540 – Acute Toxicity Requirements

New products must either:

- 1) supply the product specific acute toxicity 6 pack data (listed below),
- 2) provide a bridging rationale document or waiver request or,
- 3) use the cite all method of data compensation, if applicable. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

<b>Guideline No.</b>	<b>Acute toxicity (6 pack) Study Title</b>	<b>Cite All</b>	<b>Selective</b>	<b>Waiver Request</b>	<b>Bridging Rational</b>
830.1100	Acute Oral (LD50)	X			
830.1200	Acute Dermal (LD50)	X			
830.1300	Acute Inhalation (LC50)	X			
830.2400	Acute Eye Irritation	X			
830.2500	Acute Dermal Irritation	X			
830.2600	Dermal Sensitization	X			



**Wendy McCombie**

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**From:** notification@pay.gov  
**Sent:** Friday, March 02, 2018 12:11 PM  
**To:** Carter Wright  
**Subject:** Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or [yanchulis.michael@epa.gov](mailto:yanchulis.michael@epa.gov).

Application Name: PRIA Service Fees  
Pay.gov Tracking ID: 2685FL16  
Agency Tracking ID: 75436125401  
Transaction Type: Sale  
Transaction Date: 03/02/2018 12:10:44 PM EST

Account Holder Name: Carter Wright

Transaction Amount: \$3,830.25  
Card Type: Visa  
Card Number: \*\*\*\*\*2974

Registration Number:  
Company Name: Brainerd Chemical Company  
Company Number: 8743  
Action Code: A540

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

PLEASE NOTE THAT THE ENTIRE PAYMENT HAS BEEN MADE VIA TWO (2) PAYMENTS

**Wendy McCombie**

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**From:** notification@pay.gov  
**Sent:** Friday, March 02, 2018 12:00 PM  
**To:** Carter Wright  
**Subject:** Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or [yanchulis.michael@epa.gov](mailto:yanchulis.michael@epa.gov).

Application Name: PRIA Service Fees  
Pay.gov Tracking ID: 2685FKUM  
Agency Tracking ID: 75436121486  
Transaction Type: Sale  
Transaction Date: 03/02/2018 11:59:40 AM EST

Account Holder Name: Carter Wright

Transaction Amount: \$1,276.75  
Card Type: Visa  
Card Number: \*\*\*\*\*2974

Registration Number:  
Company Name: Brainerd Chemical Company  
Company Number: 8743  
Action Code: A540

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

DOCUMENTUM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 26, 2018

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: D-539455  
EPA File Symbol or Registration Number: 8743-RG  
Product Name: TERRASTAT 22-S  
EPA Receipt Date: 13-Mar-2018  
EPA Company Number: 8743  
Company Name: BRAINERD CHEMICAL COMPANY INC

WENDY A. McCOMBIE  
LEWIS & HARRISON, LLC  
REPRESENTING BRAINERD CHEMICAL COMPANY INC  
122 C STREET, NW - SUITE 505  
WASHINGTON, DC 20001

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A540

NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

No additional payment is due at this time. If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-8154.

Sincerely,

A handwritten signature in black ink, appearing to be "Wendy A. McCombie".

Front End Processing Staff  
Information Technology & Resources Management Division





**Fee for Service** {1017176V~

This package includes the following

for Division

- ☒ New Registration
- ☐ Amendment

- ☒ AD
- ☐ BPPD
- ☐ RD

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_

Risk Mgr. 33

Receipt No.

S- 1017176

EPA File Symbol/Reg. No.

8743-RG

Pin-Punch Date:

3/13/2018

This item is NOT subject to FFS action.

Action Code:

Parent/Child Decisions:

Requested: A540

Granted: A540

Amount Due: \$ 5,107.00

☐ Inert Cleared for Intended Use


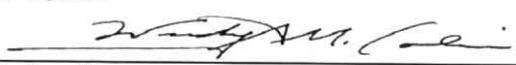
☐ Uncleared Inert in Product

Reviewer: T. H. [Signature]

Date: 2/23/18

Remarks:

**DOCUMENTUM**

 <b>EPA</b>		United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input checked="" type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> <b>Other:</b>	OPP Identifier Number
<b>Application for Pesticide - Section I</b>				
1. Company/Product Number <b>8743-</b>		2. EPA Product Manager <b>Zeno Bain</b>		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>TERRASTAT™ 22-S</b>		PM# <b>33</b>		
5. Name and Address of Applicant (Include ZIP Code) <b>Brainerd Chemical Company, Inc.</b> <b>PO Box 470010</b> <b>Tulsa, OK 74147</b> <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>63838-20</u> Product Name <u>PERASAN OG</u>		
<b>Section - II</b>				
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> "Me Too" Application <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below				
<b>Explanation:</b> Use additional page(s) if necessary. (For Section I and Section II.) <div style="text-align: center; padding: 10px;"> <b>Registration application for new end-use product.</b>  <b>PRIA Category A540</b> </div>				
<b>Section - III</b>				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt.      No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt.      No. per container	2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)	
* <b>Certification must be submitted</b>				
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container <b>No Retail Containers</b> <b>1 gal, 5 gal, 15 gal, 30 gal, 55 gal, 275 gal, 330 gal, and bulk tanker or ISO</b>		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled				
<b>Section - IV</b>				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)				
Name <b>wmccombie@lewisharrison.com</b> <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b> <b>122 C St. NW, Ste. 505, Washington DC 20001</b>		Title <b>Agent for</b> <b>Brainerd Chemical Company, Inc.</b>		Telephone No. (Include Area Code) <b>202-393-3903 x 111</b>
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received <b>(Stamped)</b>
2. Signature 		3. Title <b>Agent for</b> <b>Brainerd Chemical Company, Inc.</b>		
4. Typed Name <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b>		5. Date <b>March 2, 2018</b>		

United States Environmental Protection Agency  
Washington, D.C. 20460**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  <b>Brainerd Chemical Company, Inc.</b> <b>PO Box 470010</b> <b>Tulsa, OK 74147</b>	EPA File Symbol/Registration Number <b>8743-</b>
	Product Name <b>TERRASTAT™ 22-S</b>
	Date of Confidential Statement of Formula (EPA Form 8570-4) <b>March 2, 2018</b>

As an authorized representative of the applicant for registration of the product identified above, I here certify that:

(1) This product contains the following active ingredient(s):

- 1) Hydrogen peroxide
- 2) Peroxyacetic acid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging of another product which contains that active ingredient, which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:




(A) An accurate Confidential Statement of Formula (EPA Form 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

**OR**

(B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Hydrogen Peroxide		
*Product ingredient source information may be entitled to confidential treatment*		
Signature 	Name and Title <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b> <b>Agent for Brainerd Chemical Company, Inc.</b>	Date <b>March 2, 2018</b>

EPA Form 8570-27 (Rev. 7-91)

White - EPA copy

Yellow - Applicant copy



United States Environmental Protection Agency  
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Signature 	Name and Title <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b> <b>Agent for Brainerd Chemical Company, Inc.</b>	Date <b>March 2, 2018</b>

EPA Form 8570-27 (Rev. 7-91)

White - EPA copy

Yellow - Applicant copy

# TERRASTAT™ 22-S

TERRASTAT™ 22-S IS A PEROXYACETIC ACID-BASED ANTIMICROBIAL AGENT

<b>ACTIVE INGREDIENTS:</b>	
PEROXYACETIC ACID	22.0%
HYDROGEN PEROXIDE	5.0%
<b>INERT INGREDIENTS:</b>	<u>73.0%</u>
TOTAL	100.0%

EPA Reg. No. 8743 - \_\_\_\_\_  
EPA Est. No. 8743-OK-001; 8743-OK-002

## DANGER - PELIGRO

### KEEP OUT OF REACH OF CHILDREN

See Side Panel for Additional Precautionary Statements

Before Using This Product, Please Read The Entire Label Carefully.

Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail)

Manufactured By:  
**Brainerd Chemical Company Inc.**  
427 S. Boston Ave., Suite 2100  
Tulsa, OK. 74103  
800-551-5128

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
IF IN EYES:	<ul style="list-style-type: none"><li>• Hold eyelids open and rinse slowly and gently for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing the eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call poison control center or doctor immediately for treatment or advice.</li></ul>
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment or advice.</li><li>• Drink promptly large quantities of water</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

For 24-hour Emergency Information CALL CHEMTREC: 800-424-9300

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**DANGER CORROSIVE:** Do not enter an enclosed area without proper respiratory protection, or when uncoupling of product transfer hoses. Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. Do not breathe vapors or spray mist. Do not get in eyes, on skin, or on clothing. Wear goggles, face shield, rubber gloves and protective clothing with long sleeves when handling. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse.

**USER SAFETY RECOMMENDATIONS:** Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### PERSONAL PROTECTIVE EQUIPMENT

Handlers who may be exposed to the undiluted product through mixing, loading, application, or other tasks must wear: coveralls over long-sleeved shirt and long pants, rubber gloves, chemical resistant footwear plus socks, and protective eyewear (goggles or face shield).

Handlers who may be exposed to the undiluted product through application or other tasks must wear: long-sleeved shirt and long pants, and shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product. Do not reuse them. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**PHYSICAL OR CHEMICAL HAZARDS: STRONG OXIDIZING AGENT. CORROSIVE.** Mix only with water below 140° F. Product must be diluted in accordance with label directions prior to use. This product is not combustible; however, at temperatures exceeding 165°F, decomposition occurs releasing oxygen. The oxygen released could initiate combustion. Keep out of sunlight to better preserve active ingredients.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish, shrimp, clams, oysters, and aquatic invertebrates. Caution must be used when applying indoors because pets may be at risk. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of the National Pollution Discharge System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage plant authority.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**Storage:** Never return this product to the original container after it has been removed. Avoid all contaminants, especially dirt, caustic, reducing agents, and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of a

decomposition, isolate container, spray container with cool water and dilute this product with large volumes of water. Avoid damage to containers. Keep container closed at all times when not in use. Keep container out of direct sunlight. To maintain product quality, store at temperatures below 86°F. **Procedure for Leak or Spill:** Stop leak if this can be done without risk. Shut off ignition sources: no flames, smoking, flares, or spark producing tools. Keep combustible and organic materials away. Flush spilled material with large quantities of water. Undiluted material must not enter confined spaces.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or Hazardous Waste representative at the nearest EPA Regional Office for guidance. If material has been spilled, an acceptable method of disposal is to dilute with at least 20 volumes of water followed by discharge into suitable treatment system in accordance with all local, state and Federal environmental laws, rules, regulations, standards, and other requirements. Because acceptable methods of disposal may vary by location, regulatory agencies must be contacted prior to disposal. This product which is to be discarded, must be disposed of as hazardous waste after contacting the appropriate local State or Federal agency to determine proper procedures.

**Container Disposal: (Containers greater than 5 gallons)** Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Offer for recycling, if available. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

**Container Disposal: (Containers equal to or less than 5 gallons)** Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat the procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

**Container Disposal: (Stainless steel containers - tank trucks):** Return for reuse. Refill the container with pesticide only. Do not reuse this container for other purposes.

UN3109, Organic peroxide type F, liquid (peroxyacetic acid, Type F, stabilized (<43%)), 5.2 (8)

Density (lbs/gal): 9.40  
Net Contents: \_\_\_\_\_  
Lot. No: \_\_\_\_\_  
Exp. Date: \_\_\_\_\_

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Note: All volumes given in ounces are fluid ounces. When used according to the directions for use, this product is compatible with plastic, stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

**Note:** All volumes given in ounces are fluid ounces. When used according to the directions for use, this product is compatible with plastic, stainless steel and aluminum surfaces. If product is intended to be used on any other surface, it is recommended that you apply product to a smaller test area to determine compatibility before proceeding with its use.

ANTIMICROBIAL RINSE OF PRECLEANED OR NEW RETURNABLE OR NON-RETURNABLE CONTAINERS

To reduce the number of nonpathogenic beverage spoilage organisms, use 0.7 to 7.2 fluid ounces of product per 5 gallons of water. This provides 265 to 2700 ppm peroxyacetic acid and 62 to 628 ppm hydrogen peroxide. After applying the antimicrobial rinse, allow containers to drain thoroughly. Optional rinse with sterile or potable water.

REVERSE OSMOSIS (RO), ULTRA FILTRATION (UF) AND OTHER MEMBRANE CLEANING

This product may be used in the cleaning of ultra-filtration (UF) and reverse osmosis (RO) membranes and their associated piping systems. This product is not for use in kidney dialysis equipment. Do not use the intermittent or continuous dosing methods for non-RO food or drinking water contact applications. This product may not totally eliminate all vegetative microorganisms in RO or NF or UF membranes and their associated piping systems due to their construction or assembly, but can be relied upon to reduce the number of microorganisms to acceptable levels when used as directed. Prior to using this product check with membrane manufacturer to confirm compatibility of membranes with various types or concentration of peroxyacetic acid solutions.

**Batch Cleaning of NF, UF and RO Systems:** Isolate incompatible equipment, such as carbon filters and ion exchangers. Clean system with an appropriate cleaner and follow with RO permeate water or potable water. Remove mineral deposits if necessary with an acidic cleaner, and rinse as before. Fill entire system with water and add up to 0.28% of this product by volume. This will equal 680 ppm peroxyacetic acid and 158 ppm hydrogen peroxide. Recirculate the cleaning solution through the piping and membrane system at 20° C for 10 minutes minimum, or up to 4 hours, depending on the severity of cleaning to be done. Open and close process valves and solenoids to be sure all parts are in contact with the solution. Rinse the system with RO permeate or potable water until residual peroxygen concentration is below 1 ppm.

**Continuous or Intermittent Addition:** For continuous addition (dosing) for RO systems, use 2-5 ppm of active peroxyacetic acid, which equals 1-2.6 fl. oz. of this product per 1000 gallons of process water. For occasional intermittent feed, do not exceed 93 ppm active peroxyacetic acid, which equals 0.5 fl. oz. of this product per 10 gallons of feed water. Continuous or intermittent dosing of this product is not allowed for use in NF or UF systems for on-line food or drinking water applications.

BIOFOULING CONTROL IN PULP, PAPER AND PAPERBOARD MILL AND WATER SYSTEMS

Not for use in California

For use in the manufacture of paper and paperboard intended for food or nonfood contact. This product can be used to control bacteria and fungi in paper, paperboard or non-woven process water and influent water systems. Suitable dosing points include but are not limited to: stock chests, pulpers, the white-water loop, white water storage systems and influent water streams.

**Influent Water Systems:** This product should be fed continuously to incoming fresh water streams (non potable use only) at dosages ranging from 0.08- 1.4 lbs (1-13.7 fl. oz) of this product per 1000 gallons of raw or process water (2.0-35 ppm peroxyacetic acid). Adjust dosage as necessary to maintain microbiological control.

Mill Process Waters:



**Intermittent Feed** - This product may be fed intermittently (for example: 2-3 hours per 8 hour shift) at dosages ranging from 0.35 lbs to 0.84 lb (4.9-11.2 fl. oz.) of this product per ton (dry basis) of pulp or paper produced. This dosage is equivalent to 37-90 ppm peroxyacetic acid. Repeat as necessary when the peroxyacetic acid concentration reaches less than 2 ppm.

**Continuous Feed** - This product should be fed continuously at dosages ranging from 0.08-0.84 lbs (1-11.2 fl. oz) of this product per ton (dry basis) of pulp or paper produced. This dosage is equivalent to 8.0-90 ppm peroxyacetic acid.

**Shock (slug) Dose** – This product may be used to shock dose systems requiring a high level of biofouling control. Use rates ranging from 0.7-5.6 lbs (9.5-75.4 fl. oz.) of this product per ton (dry basis) of pulp or paper produced may be necessary. This dosage is equivalent to 75-600 ppm peroxyacetic acid. Shock dose every 1-3 hrs as necessary until biofouling control is evident. Thereafter, revert to continuous or intermittent feed methods.

**CONTROL OF SLIME FORMING BACTERIA AND BIOFOULING IN ONCE-THROUGH AND RECIRCULATING COOLING WATER (COOLING TOWERS, EVAPORATIVE CONDENSERS, AIR WASHERS) AND ORNAMENTAL OR RECREATIONAL WATER FEATURES**

Severely fouled systems must be cleaned before adding this product. This product must be added in the water system directly, and not mixed with any other chemicals or additives. Never add this product into any feeding device, such as shot feeders, filter housings, by-pass feeders, or miscellaneous piping of any kind, because dangerous acute decomposition can occur. Discontinue the use of chlorine or bromine products prior to using this product. Contamination with other chemicals could result in product decomposition. Add this product to only water at a point in the system where uniform mixing and even distribution will occur. For shock (slug) treatment for moderately to severely fouled systems add 3.7-14 fl. oz. of this product per 1000 gallons of process water (7-27 ppm peroxyacetic acid). Repeat as necessary until microbiological control is evident. Thereafter, to maintain control use (1-5.2 fl. oz.) of this product per 1000 gallons of process water (2-10 ppm of peroxyacetic acid) as a continuous treatment method. Continuous dosing methods usually require 1-3.7 fl. oz. per 1000 gallons of water (2-7 ppm peroxyacetic acid) to achieve adequate results. Intermittent dosing treatment usually require dose cycles of a minimum once per every other day, up to 6 times per 24 hours. Recommended rates for intermittent dose cycles are 3.7-7 fl. oz of this product per 1000 gallons of process water (7-14 ppm peroxyacetic acid). **CLEANING:** To remove sessile bacteria from cooling systems it is necessary to clean slime and slime-forming bacteria from the surfaces of all areas of water contact. This can be accomplished by treating the recycled water with 26.7-80 fl oz. of this product per 1000 gal of water (50-150 ppm active peroxyacetic acid) for 4-8 hours during normal tower operating cycles. This procedure can be used for online or offline cleaning. When finished, bleed down the system until the PAA level is <5-10 ppm, then normal chlorine or bromine or PAA treatments can begin. This treatment must be done at least once or twice each year depending on exposure conditions.

**Air Washers:** This product may be used to control bacteria and biofouling in industrial air washing/scrubbing systems. The air washer must have operational and effective mist elimination systems. Prior to use of this product, heavily fouled systems must be pre-cleaned using the appropriate cleaner. Continuous dosing methods will require 2-7 ppm and intermittent dosing methods require 7-14 ppm (as peroxyacetic acid), as described in the previous 2 paragraphs, depending on the type of system and the level of microbiological control desired.

**Evaporated or Condensed Water:** This product may be used to treat SWEET or COW water (e.g. condensate of whey) collected from evaporated or condensing water systems in food or dairy plants. Continuous dosing methods will require 2-7 ppm and intermittent dosing methods require 7-14 ppm (as peroxyacetic acid) as described in the previous paragraph, depending on the type of system and the level of microbiological control desired.

**MICROBIAL CONTROL IN EFFLUENT TREATMENT SYSTEMS**

Use this product to treat sewage and wastewater effluent systems associated with public and private wastewater treatment plants. This product may be applied alone at any point in the treatment train, such as debulking control, or may effectively be used in conjunction with other systems, such as Ultra Violet (UV) light. Doses for UV systems will typically be 1-4 ppm (as active PAA). Initially apply this product at the rate of 2-63 gal per million gallons of water to be treated (0.5-15 ppm as peracetic acid). The PAA dosage will depend on the quality of water, contact (holding) time, and the degree of microbial control necessary. The PAA concentration will rapidly decline after treatment, but the maximum amount of PAA that may be discharged into the receiving body of water is limited to 1 ppm as active PAA, or as required for local discharge requirements. Consult your Enviro Tech representative for recommendations regarding an accurate test kit or on-line analyzer.

**OIL, GAS AND SECONDARY OIL RECOVERY SYSTEMS, DRILLING MUDS AND PACKING FLUID**

This product may be used to treat water used in primary or secondary oil and gas recovery systems to control anaerobic sulfide-forming bacteria, aerobic slime-forming bacteria. This product may be used in fresh or recycled water, secondary recovery systems, muds or fluids. This product controls biofilm and slime deposits on products associated with oilfield and gas field systems which are susceptible to contamination. It also controls slime deposits downhole in water-bottoms. Add sufficient amount of this product to achieve satisfactory biological control. Initial recommended dosing levels of 5 to 100 ppm as active peroxyacetic acid are suggested. A dosage of 2.6 fl. oz. per 1000 gallons of water yields approximately 5 ppm of peroxyacetic acid.

**TREATMENT OF FRUIT AND VEGETABLE PROCESS WATER SYSTEMS**

This product can be used in water or ice that contacts raw or fresh, post-harvest or further processed fruits and vegetables for the control of spoilage and decay causing bacteria and fungi (non-public health microorganisms) in commercial operations and packinghouses.

**Batch, Continuous or Spray System Processes:** Fill vessel containing fruits and vegetables with known amount of water. Ensure that water is circulating in vessel if using the submersion method. **Add this product to no more than 500 ppm residual peroxyacetic acid to the use solution in accordance with FCN #1823.** This can be accomplished by initially adding 2.7 fl. oz. per 10 gallons of water. The recommended concentration is between 30-300 ppm as peroxyacetic acid (0.16-1.6 fl. oz. per 10 gallons of water). The final concentration necessary to accomplish the intended task will vary from plant-to-plant. The fruits and vegetables can be continuously sprayed or submerged (dipped) in the resulting solution. Periodic or continuous additions of this product to maintain the required concentration may be added as necessary. It is also recommended to apply this product during the washing, chilling, or physical cleaning processes, including the roller-spreader, washer or brush washer manifold, dip tank, or sorting processes. Contact time of 60 seconds is recommended to insure efficacy. A potable water rinse is not required

**NON-AGRICULTURAL USE REQUIREMENTS**

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

**AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and Restricted-Entry Interval (REI). The requirements in this box only apply to the uses of this

product that are covered by the Workers Protection Standard. There is a restricted entry of zero (0) hours for this product.

### AGRICULTURAL or HORTICULTURAL USES

There is a Restricted-Entry-Interval of zero (0) hours after the use of this product. Upon soil contact this diluted product decomposes rapidly to oxygen, carbon dioxide and water. This product may be harmful to fish if exposed on a continuous basis at concentrations of 1 ppm or more of active peroxyacetic acid. Meter this product into pressurized pipes using a plastic or stainless steel injection/backflow device installed far enough upstream from the equipment to ensure thorough mixing. For open flowing bodies of water, apply this product as far upstream as possible to allow adequate mixing prior to the flow entering any larger body of water. If open pouring of this product is required pour product as close to the surface of the water as possible to reduce odor exposure. Spray lines, hoses and tank must be clean before using this product. Make sure no iron or yellow metals are in contact with the spray solution at any time. Only stainless steel or plastic contact materials may be used in your spray rig.

[Compatibility: This product is compatible as a direct injection or tank-mix with many commonly used pesticides, fertilizers, adjuvants and non-ionic surfactants but has not been fully evaluated with all of these. Do not direct inject or tank mix this product in to the irrigation system or in spray tank with pesticides, surfactants or fertilizers before conducting a compatibility test to show it is physically compatible, effective and noninjurious under your use conditions. Do not tank mix this product with copper or other pesticides containing metals at a dilution rate stronger than 1:100.

To ensure compatibility, evaluate them prior to use as follows: Using a suitable container, add proportional amounts of product to water. Add wettable powders first, followed by water dispersible granules, then by liquid flowables and lastly, emulsifiable concentrates. Mix thoroughly and let stand for at least five minutes. If the combination stays mixed or can be remixed, it is physically compatible. Test the combination on a small portion of the crop to be treated to ensure that a phytotoxic response will not occur as a result of application.]

**Treatment of Agricultural or Irrigation Water Systems (sand filters, humidification systems, storage tanks, ponds, reservoirs, canals):** For the control of sulfides, odor, slime and algae in water systems, apply this product at 2-10 ppm active peroxyacetic acid. This feed rate equals 10.5-53.4 fl. oz per 10,000 gallons of water. Repeat dose as necessary to maintain control, which will vary with seasonal conditions. For prevention of algae, some systems may require continuous low level dosing during warm sunny periods (2-5 ppm peroxyacetic acid).

**Drip Irrigation Systems:** To clean slime and algae from drip system filters, tapes and emitters, meter this product at the rate of 5.2-10.5 fl. oz. per 1000 gallons of water (10-20 ppm peroxyacetic acid). When required during normal irrigation cycles, use this product at the recommended dose for a minimum of 30 minutes. After an irrigation cycle do not flush the lines.

**Greenhouses:** This product can be used to suppress/control algae and slime formations in and around greenhouses. For normal use in various process, irrigation or sprinkler water systems, this product may be used at 1:60,000 to 1:7300 dilutions (4-33 ppm as peroxyacetic acid). Heavily fouled systems, such as evaporative coolers or irrigation/drip lines may need shock doses of up to 100 ppm as peroxyacetic acid (1:2400 dilution).

**Soil Applications:** Use this product at 11.7-23.4 fl. oz. per 100 gal of water (220-440 ppm active peroxyacetic acid) for the control of soil-borne diseases such as Fusarium, Phytophthora, Pythium, Verticillium, Thielaviopsis, and Rhizoctonia. This product can be applied by drench, flood, drip or sprinkler irrigation systems. Best results may be obtained by application prior to and during the seeding or transplant operations. Wait one day before inoculating the soil with beneficial microbes.

**Foliar Applications:** This product may be used to cure or prevent bacterial and fungal diseases on growing agricultural crops, including all grains, herbs, spices, row crops, berries, fruit and nut trees, vines (such as grapes) and tobacco. Typical use rates are 3.9-35.4 fl. oz. of this product per 100 gal of water (73.4-663 ppm active peroxyacetic acid) applied at 30–100 gal of mixed solution per acre of foliage. Curative (or rescue) treatment requires the lower dilution rates, while preventative treatments use the higher dilution rates. Apply curative treatments for 2-3 days and then resume weekly preventative treatments thereafter. Good coverage and wetting of the foliage is required. Not all plant diseases have been tested, but some of the common diseases controlled are: Alternaria spp., Anthracnose, Aphanomyces, Bacterial Blight, Black Spot, Botrytis (gray mold), Brown Spot, Copper Spot, Dollar Spot, Early and Late Blights, Erwinia spp. (such as bacterial wilt), Fairy Ring, Fusarium Root Rot and Blight, Fruit, Black, Brown, Stem and Sour Rots, Leaf and Bacterial Spots, Plasmopara, Powdery and Downy mildews, Phytophthora Blight/Rots, Pink Snow Mold, Pseudomonas and Xanthomonas spp. (such as bacterial angular leaf spot, bacterial leaf spec, black soft rot), Pythium spp., Rhizoctonia spp., Rusts, Scabs, Scum, Slime Molds, Smut, Summer Patch, Stripe Smut, Take-all Patch, and Thielaviopsis.

A nonionic spreader (surfactant) adjuvant may be used. Contact your local supplier or farm supply.


**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**401 M Street, S.W.  
WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address and Telephone Number <b>202-393-3903 x111</b> <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>	EPA Registration Number/ File Symbol <b>8743-_____</b>
Active Ingredient(s) and/or representative test compound(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and,</b> <b>b) Peroxyacetic Acid (Chem. No. 63201)</b>	Date <b>March 2, 2018</b>
General use pattern(s) (list all those claimed for this product using 40 CFR Part 158) <b>Indoor Non-Food Use Antimicrobial</b>	Product Name <b>TERRASTAT™ 22-S</b>

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data Call-In Notice is supported by all data submitted or cited in the application for registration, the form for reregistration, or this Data Call-In response. In addition, if cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original submitter or that I have obtained the written permission of the original submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the written permission of the original data submitter to use this study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

**I certify that the statements I have made on this form and all attachments to it are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.**

Signature 	Date March 2, 2018	Typed or Printed Name and Title <b>Wendy A. McCombie, Lewis &amp; Harrison LLC</b> <b>Agent for Brainerd Chemical Company, Inc.,</b>
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date <b>March 2, 2018</b>		EPA Reg. No./File Symbol <b>8743-____</b>		Page 1 of 12	
Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550/880.1100	Product identity and composition	50543001	Brainerd (Co. #8743)	OWN	
830.1600/880.1200	Description of material used to product the product	50543001	Brainerd (Co. #8743)	OWN	
830.1620/880.1200	Description of the production process	50543001	Brainerd (Co. #8743)	OWN	
830.1650	Description of the formulation process	50543001	Brainerd (Co. #8743)	OWN	
830.1670/880.1400	Discussion of formation of impurities	50543001	Brainerd (Co. #8743)	OWN	
830.1700	Preliminary analysis	50543002	Brainerd (Co. #8743)	OWN	
830.1750	Certified limits	50543001	Brainerd (Co. #8743)	OWN	
830.1800	Enforcement analytical method	50543002	Brainerd (Co. #8743)	OWN	
830.6302	Color	50543003	Brainerd (Co. #8743)	OWN	
830.6303	Physical State	50543003	Brainerd (Co. #8743)	OWN	
830.6304	Odor	50543003	Brainerd (Co. #8743)	OWN	
830.6313	Stability	50543004	Brainerd (Co. #8743)	OWN	
830.6314	Oxidation/Reduction	50543003	Brainerd (Co. #8743)	OWN	
830.6315	Flammability	50543003	Brainerd (Co. #8743)	OWN	
830.6316	Explodability	50543004	Brainerd (Co. #8743)	OWN	
830.6317	Storage Stability	50543004	Brainerd (Co. #8743)	OWN	
830.6319	Miscibility	50543004	Brainerd (Co. #8743)	OWN	
830.6320	Corrosion characteristics	50543004	Brainerd (Co. #8743)	OWN	
830.6321	Dielectric Breakdown Voltage	50543004	Brainerd (Co. #8743)	OWN	
830.7000	pH	50543003	Brainerd (Co. #8743)	OWN	
830.7050	UV/Visible Absorption	50543004	Brainerd (Co. #8743)	OWN	
830.7100	Viscosity	50543003	Brainerd (Co. #8743)	OWN	
830.7200	Melting point/melting range	50543004	Brainerd (Co. #8743)	OWN	
830.7220	Boiling point/boiling range	50543004	Brainerd (Co. #8743)	OWN	
830.7300	Density/relative density/bulk density	50543003	Brainerd (Co. #8743)	OWN	
830.7370	Dissociation constants in water	50543004	Brainerd (Co. #8743)	OWN	
830.7550	Partition coefficient	50543004	Brainerd (Co. #8743)	OWN	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water solubility	50543004	Brainerd (Co. #8743)	OWN	
830.7950	Vapor Pressure	50543004	Brainerd (Co. #8743)	OWN	
835.2120	Hydrolysis	No MRID Assigned <sup>1</sup>	None	PL	
835.2240	Photodegradation in Water	No MRID Assigned <sup>1</sup>	None	PL	
835.2370	Photodegradation in Air	No MRID Assigned <sup>1</sup>	None	PL	
835.4100	Aerobic Soil Metabolism	No MRID Assigned <sup>1</sup>	None	PL	
835.4400	Anaerobic Soil Metabolism	No MRID Assigned <sup>1</sup>	None	PL	
835.4300	Aerobic Aquatic Metabolism	No MRID Assigned <sup>1</sup>	None	PL	
835.2100	Adsorption/Desorption/Soil Column Leaching	No MRID Assigned <sup>1</sup>	None	PL	
835.1110	Activated Sludge Sorption Isotherm	-----	-----	DATA GAP <sup>2</sup>	
835.3110	Ready Biodegradability	----	----	DATA GAP <sup>2</sup>	
850.1010	Aquatic Freshwater Invertebrate Toxicity	46833603	Evonik Corp (Co. #54289)	PAY	
850.1035	Mysid Acute Toxicity	47477203	Evonik Corp (Co. #54289)	PAY	
850.1055	Bivalve Acute Toxicity	46833604	Evonik Corp (Co. #54289)	PAY	
		46833605	Evonik Corp (Co. #54289)	PAY	
850.1075	Fish Acute Toxicity	00153760	BASF (Co #53263)	OLD	
		00153761	BASF (Co #53263)	OLD	
850.2100	Acute Avian Oral – Quail/Duck	----	---	DATA GAP <sup>3</sup>	
850.2200	Avian Dietary – Quail & Mallard	WAIVED <sup>4</sup>	---	---	
850.4400	Aquatic Vascular Plant Toxicity – Lemna	46966604	Solvay (EPA Co. #68660)	PAY	
850.5400	Algal Toxicity				
	-Navicula	46966605	Solvay (EPA Co. #68660)	PAY	
	-Anabena	46966606	Solvay (EPA Co. #68660)	PAY	
	-Skeletonema	46966607	Solvay (EPA Co. #68660)	PAY	
	-Selenastrum	46833634	Evonik Corp (Co. #54289)	PAY	
850.6800	Modified Activated Sludge Respiration	-----	-----	DATA GAP <sup>2</sup>	
855.2500	Inhalation Exposure	-----	-----	DATA GAP <sup>2</sup>	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Date	March 2, 2018	EPA Reg. No./File Symbol	8743-____	Page 3 of 12	
Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity	CITE-ALL	See List	PAY	
870.1200	Acute Dermal Toxicity	CITE-ALL	See List	PAY	
870.1300	Acute Inhalation Toxicity	CITE-ALL	See List	PAY	
870.2400	Primary Eye Irritation	CITE-ALL	See List	PAY	
870.2500	Primary Dermal Irritation	CITE-ALL	See List	PAY	
870.2600	Skin Sensitization	CITE-ALL	See List	PAY	
870.3100	90-Day Oral (rodent)	WAIVED <sup>5</sup>	---	---	
870.4365	90-Day Inhalation Toxicity	49996501	PCTF (Co. #89390)	PAY	
870.3700	Developmental Toxicity Study	WAIVED <sup>5</sup>	---	---	
870.3800	Reproduction and Fertility Effects Study	WAIVED <sup>5</sup>	---	---	
870.4200	Carcinogenicity	WAIVED <sup>5</sup>	---	---	
870.4100	Chronic Toxicity	WAIVED <sup>5</sup>	----	---	
870.5100	Bacterial Reverse Mutation Study	WAIVED <sup>6</sup>	----	---	
870.5375	<i>In vitro</i> Mammalian Chrom. Aberr.	WAIVED <sup>6</sup>	----	---	
870.5500	<i>In Vivo</i> cytogenetics	WAIVED <sup>6</sup>	----	---	
875.1400	Inhalation Indoor Exposure	-----	-----	DATA GAP <sup>2</sup>	
875.1600	Data Reporting and Calculations	-----	-----	DATA GAP <sup>2</sup>	
875.1700	Product Use Information	-----	-----	DATA GAP <sup>2</sup>	
875.2800	Description of Human Activity	-----	-----	DATA GAP <sup>2</sup>	
875.2900	Data Reporting and Calculations	-----	-----	DATA GAP <sup>2</sup>	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Date	March 2, 2018	EPA Reg. No./File Symbol	8743-____	Page 4 of 12
Applicant's/Registrant's Name & Address: Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147		Product TERRASTAT™ 22-S		
Ingredient(s): a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status Note

DATA SUBMITTERS: PEROXYACETIC ACID

CO.NO.	COMPANY NAME	C/O OR AGENT	STREET	CITY	STATE	ZIP
833	ALEX C. FERGUSSON LLC		5121 COFFEY AVE.	CHAMBERSBURG	PA	17201
1043	STERIS CORPORATION		PO BOX 147	ST. LOUIS	MO	631660147
1677	ECOLAB, INC.		1 ECOLAB PLACE	ST. PAUL	MN	55102
4959	WEST AGRO, INC.		11100 N. CONGRESS AVE.	KANSAS CITY	MO	64153
9402	KIMBERLY-CLARK GLOBAL SALES, LLC		2100 WINCHESTER ROAD	NEENAH	WI	54956
10324	MASON CHEMICAL COMPANY		2744 E. KEMPER RD.	CINCINNATI	OH	45241
49538	PHYTON CORPORATION	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC	20001
52252	MEDIVATORS INC	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC	20036
54289	EVONIK CORPORATION		299 JEFFERSON RD.	PARSIPPANY	NJ	07054
62432	ANTEC INTERNATIONAL LTD.	THE CHEMOURS COMPANY FC, LLC.	1007 MARKET STREET	WILMINGTON	DE	19898
63838	ENVIRO TECH CHEMICAL SERVICES, INC.		500 WINMOORE WAY	MODESTO	CA	95358
65402	PEROXYCHEM, LLC		2005 MARKET STREET, SUITE 3200	PHILADELPHIA	PA	19103
67619	CLOROX PROFESSIONAL PRODUCTS COMPANY	C/O PS&RC	PO BOX 493	PLEASANTON	CA	945660803
68660	SOLVAY CHEMICALS, INC.	LEWIS & HARRISON, L.L.C	122 C STREET, NW, SUITE 505	WASHINGTON	DC	20001
70299	BIOSAFE SYSTEMS, LLC		22 MEADOW STREET	EAST HARTFORD	CT	06108
70627	DIVERSEY, INC.		1410 NEWMAN ROAD	RACINE	WI	53406
71654	THE CHEMOURS COMPANY FC, LLC		1007 MARKET STREET	WILMINGTON	DE	19898

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147		Product TERRASTAT™ 22-S				
Ingredient(s): a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
81073	CET, LLC.	TECHNOLOGY SCIENCE GROUP, INC.	1150 18TH ST., N.W., SUITE 1000	WASHINGTON	DC 20036	
81242	YCLEAN ENTERPRISES, LLC	KILLOREN REGULATORY CONSULTING	316 HIGHLAND AVE.	HARTFORD	WI 53027	
82138	FLOCHEM, LTD.	DELTA ANALYTICAL CORP	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRING	MD 20904	
82808	AGROCHEM INC.	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH 44256	
83103	HDH AGRI PRODUCTS, LLC		27536 CR 561	TAVARES	FL 32778	
83162	AMERICAN CHEMISTRY COUNCIL	ANTIMICROBIAL EXPOSURE ASSESSMENT TASK FORCE II	700 2ND STREET, NE	WASHINGTON	DC 20002	
84545	SBIOMED, LLC	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH 44256	
85402	SPA CONCEPTS, INC		1601 APPLEWOOD WAY	TALLAHASSEE	FL 32312	
88089	BIOMED PROTECT, LLC	LANDIS INTERNATIONAL INC	PO BOX 5126 3185 MADISON HIGHWAY	VALDOSTA	GA 316035126	
89390	PEROXY COMPOUNDS TASK FORCE	C/O KELLER AND HECKMAN	1001 G STREET NW, SUITE 500 WEST	WASHINGTON	DC 20001	
91209	BLUETECH LABORATORIES, INC.	TECHNOLOGY SCIENCES GROUP, INC.	1150 18TH STREET N.W. SUITE 1000	WASHINGTON	DC 20036	
91628	BIOSAN LLC	KRK CONSULTING LLC.	5807 CHURCHILL WAY	MEDINA	OH 44256	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

**DATA SUBMITTERS: HYDROGEN PEROXIDE**

CO.NO	COMPANY NAME	C/O OR AGENT	STREET	CITY	STATE	ZIP
335	ARKEMA INC.		900 FIRST AVENUE	KING OF PRUSSIA	PA	194061308
352	E. I. DU PONT DE NEMOURS AND COMPANY	ATTN: MANAGER, US REGISTRATION, DUPONT CROP PROTECTION	CHESTNUT RUN PLAZA (CRP 720/2E5), 974 CENTRE RD.	WILMINGTON	DE	19805
777	RECKITT BENCKISER LLC.	D/B/A RECKITT BENCKISER	399 INTERPACE PARKWAY	PARSIPPANY	NJ	070540225
833	ALEX C. FERGUSON LLC		5121 COFFEY AVE.	CHAMBERSBURG	PA	17201
1043	STERIS CORPORATION	STERIS	PO BOX 147	ST. LOUIS	MO	631660147
1270	ZEP, INC.	ZEP, INC. / COMPLIANCE SERVICES	3330 CUMBERLAND BLVD., SUITE 700	ATLANTA	GA	30339
1448	BUCKMAN LABORATORIES INC.		1256 NORTH MCLEAN BLVD	MEMPHIS	TN	38108
1658	HILLYARD INDUSTRIES INC		PO BOX 909	SAINT JOSEPH	MO	64502
1677	ECOLAB, INC.		1 ECOLAB PLACE	ST. PAUL	MN	55102
3573	THE PROCTER & GAMBLE COMPANY	D/B/A PROCTER & GAMBLE	5299 SPRING GROVE AVE - F&HC PS&RA	CINCINNATI	OH	45217
4170	BETCO CORP. LTD	D/B/A BETCO CORPORATION	400 VAN CAMP ROAD	BOWLING GREEN	OH	43402
4822	S.C. JOHNSON & SON INC.		1525 HOWE STREET	RACINE	WI	53403
4959	WEST AGRO, INC.		11100 N. CONGRESS AVE.	KANSAS CITY	MO	64153
5741	SPARTAN CHEMICAL COMPANY, INC.		1110 SPARTAN DRIVE	MAUMEE	OH	43537

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>			Product <b>TERRASTAT™ 22-S</b>				
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>							
Guideline Reference Number		Guideline Study Name		MRID Number	Submitter	Status	Note
6297	BISSELL HOMECARE, INC.	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC	20036	
8654	MEDICAL CHEMICAL CORP		19430 VAN NESS AVE.	TORRANCE	CA	90501	
9402	KIMBERLY-CLARK GLOBAL SALES, LLC		2100 WINCHESTER ROAD	NEENAH	WI	54956	
9480	PROFESSIONAL DISPOSABLES INTERNATIONAL, INC.	DELTA ANALYTICAL CORP	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRING	MD	20904	
10324	MASON CHEMICAL COMPANY		2744 E. KEMPER RD.	CINCINNATI	OH	45241	
10772	CHURCH & DWIGHT CO., INC.	LANDIS INTERNATIONAL, INC.	PO BOX 5126	VALDOSTA	GA	316035126	
16930	SOLIDS, INC.		8714 EAST 16TH STREET	KANSAS CITY	MO	64126	
45745	MIDLAB		140 PRIVATE BRAND WAY	ATHENS	TN	37303	
49058	WAYNE CONCEPT MANUFACTURING CO., INC.	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH	44256	
49158	RUG DOCTOR, LLC	SCIENTIFIC & REGULATORY CONSULTANTS, INC.	201 W. VAN BUREN STREET	COLUMBIA CITY	IN	46725	
49538	PHYTON CORPORATION	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC	20001	
49620	AKZO NOBEL PULP AND PERFORMANCE CHEMICALS INC.	KELLER AND HECKMAN LLP	1001 G STREET NW, SUITE 500 WEST	WASHINGTON	DC	20001	
52252	MEDIVATORS INC	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC	20036	
54289	EVONIK CORPORATION		299 JEFFERSON RD.	PARSIPPANY	NJ	07054	
58779	STERIS CORP		PO BOX 147	ST. LOUIS	MO	631660647	
59639	VALENT U.S.A. LLC		1600 RIVIERA AVENUE,	WALNUT CREEK	CA	945968025	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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401 M Street, S.W.  
WASHINGTON, D.C. 20460

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DATA MATRIX

Date	March 2, 2018	EPA Reg. No./File Symbol	8743-____	Page 8 of 12		
Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>				
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
			SUITE 200			
62432	ANTEC INTERNATIONAL LTD.	THE CHEMOURS COMPANY FC, LLC.	1007 MARKET STREET	WILMINGTON	DE 19898	
63394	AMERICAN CHEMISTRY COUNCIL	ANTIMICROBIAL EXPOSURE ASSESSMENT TASK FORCE	700 2ND STREET, NE	WASHINGTON	DC 20002	
63761	STERILEX LLC, D/B/A STERILEX	LEWIS & HARRISON, LLC	122 C STREET, NW, SUITE 505	WASHINGTON	DC 20001	
63838	ENVIRO TECH CHEMICAL SERVICES, INC.		500 WINMOORE WAY	MODESTO	CA 95358	
65402	PEROXYCHEM, LLC		2005 MARKET STREET, SUITE 3200	PHILADELPHIA	PA 19103	
66045	PIPERONYL BUTOXIDE TASK FORCE II	CSPA/PIR	1667 K STREET NW, SUITE 300	WASHINGTON	DC 20006	
66607	SPRAY DRIFT TASK FORCE	MCKENNA, LONG & ALDRIDGE LLP	1900 K STREET, NW	WASHINGTON	DC 20006	
67619	CLOROX PROFESSIONAL PRODUCTS COMPANY	C/O PS&RC	PO BOX 493	PLEASANTON	CA 945660803	
68660	SOLVAY CHEMICALS, INC.	LEWIS & HARRISON, L.L.C	122 C STREET, NW, SUITE 505	WASHINGTON	DC 20001	
68959	VELTEK ASSOCIATES INC.	ATTN: PAM DESCHENES	15 LEE BOULEVARD	MALVERN	PA 193551234	
69268	ENVIROX, LLC	D/B/A ENVIROX	1938 E. FAIRCHILD STREET	DANVILLE	IL 618322327	
70299	BIOSAFE SYSTEMS, LLC		22 MEADOW STREET	EAST HARTFORD	CT 06108	
70627	DIVERSEY, INC.		1410 NEWMAN ROAD	RACINE	WI 53406	
71355	CID LINES N.V.	SCIENTIFIC & REGULATORY CONSULTANT'S INC.	201 W. VAN BUREN STREET	COLUMBIA CITY	IN 46725	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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DATA MATRIX

Date <b>March 2, 2018</b>			EPA Reg. No./File Symbol <b>8743-____</b>			Page 9 of 12	
Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>			Product <b>TERRASTAT™ 22-S</b>				
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>							
Guideline Reference Number		Guideline Study Name		MRID Number	Submitter	Status	Note
71654	THE CHEMOURS COMPANY FC, LLC			1007 MARKET STREET	WILMINGTON	DE	19898
71871	ADVANCED STERILIZATION PRODUCTS	LEWIS & HARRISON, LLC		122 C STREET, N.W., SUITE 505	WASHINGTON	DC	20001
71973	UNELKO CORPORATION			14641 N. 74TH ST.	SCOTTSDALE	AZ	85260
71975	NORTHWEST AGRICULTURAL PRODUCTS			821 SOUTH CHESTNUT STREET	PASCO	WA	993023453
72032	SELSOURCE, INC.	KELLER AND HECKMAN, LLP		1001 G STREET, N.W., SUITE 500 WEST	WASHINGTON	DC	20001
72372	PEROXYCHEM, LLC			2005 MARKET STREET, SUITE 3200	PHILADELPHIA	PA	19103
72744	GREENSMITHS, INC.	D/B/A AGRI-NUTRIENTS, INC.		5201 BIRD CREEK AVENUE	PORT OF CATOOSA	OK	74015
72897	TRIOMED INNOVATIONS CORP.			40 ALLEN ROAD	SOUTH BURLINGTON	VT	05403
73817	REDOX CHEMICALS INC.			130 SOUTH 100 WEST	BURLEY	ID	83318
74436	EFT HOLDINGS INC.	D/B/A ENVIROFOAM TECHNOLOGIES		1275 ROCK CREEK CIRCLE	LAFAYETTE	CO	80026
74559	VIROX TECHNOLOGIES INC.	SCIENTIFIC & REGULATORY CONSULTANTS, INC.		201 W. VAN BUREN STREET	COLUMBIA CITY	IN	46725
74887	ANTIMICROBIAL EXPOSURE JOINT VENTURE (AEJV)	CSPA/PIR		1667 K STREET, NW, SUITE 300	WASHINGTON	DC	20006
75829	GARRISON DENTAL SOLUTIONS			150 DEWITT LANE	SPRING LAKE	MI	49456
80346	MDS HOLDINGS			PO BOX 18155	GOLDEN	CO	80402
81073	CET, LLC.	TECHNOLOGY SCIENCE GROUP, INC.		1150 18TH ST., N.W., SUITE 1000	WASHINGTON	DC	20036

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
81242	YCLEAN ENTERPRISES, LLC	KILLOREN REGULATORY CONSULTING	316 HIGHLAND AVE.	HARTFORD	WI 53027
82138	FLOCHEM, LTD.	DELTA ANALYTICAL CORP	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRING	MD 20904
82723	KNOCK-OUT TECHNOLOGIES, LTD		387 DOVER FURNACE ROAD	DOVER PLAINS	NY 12522
82780	PROGRESSIVE GLOBAL TECHNOLOGIES, INC.		911 KCK WAY, SUITE 1	CEDAR HILL	TX 75106
82808	AGROCHEM INC.	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH 44256
83103	HDH AGRI PRODUCTS, LLC		27536 CR 561	TAVARES	FL 32778
83162	AMERICAN CHEMISTRY COUNCIL	ANTIMICROBIAL EXPOSURE ASSESSMENT TASK FORCE II	700 2ND STREET, NE	WASHINGTON	DC 20002
84198	EARTH LABORATORIES, INC.		1101 EAST DIAMOND AVENUE	EVANSVILLE	IN 477113903
84526	HALOSIL INTERNATIONAL, INC.	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC 20001
84545	SBIOMED, LLC	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH 44256
85402	SPA CONCEPTS, INC		1601 APPLEWOOD WAY	TALLAHASSEE	FL 32312
85837	INNOVASOURCE, LLC	KELLER AND HECKMAN, LLP	1001 G STREET, N.W. SUITE 500 WEST	WASHINGTON	DC 20001
86381	PIMI AGRO CLEAN TECH, LTD	LEWIS & HARRISON, LLC	122 C STREET, NW, SUITE 505	WASHINGTON	DC 20001
86729	A GROWING ALTERNATIVE, INC.		751 FAIRVIEW CHURCH ROAD	SPRUCE PINE	NC 28777
87358	QUICK-MED TECHNOLOGIES, INC.	TECHNOLOGY SCIENCES GROUP, INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC 20036

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
88089	BIOMED PROTECT, LLC	LANDIS INTERNATIONAL INC	PO BOX 5126, 3185 MADISON HIGHWAY	VALDOSTA	GA 316035126
89094	ASEPTIX RESEARCH BV	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC 20001
89390	PEROXY COMPOUNDS TASK FORCE	C/O KELLER AND HECKMAN	1001 G STREET NW, SUITE 500 WEST	WASHINGTON	DC 20001
89828	KEYLATE SOLUTIONS LLC		4833 SARATOGA BLVD. #334	CORPUS CHRISTI	TX 78413
89833	DECON7 SYSTEMS, LLC	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 100	WASHINGTON	DC 20036
89883	ESSENTIAL WATER SOLUTIONS, INC	SPRING TRADING COMPANY	203 DOGWOOD TRAIL	MAGNOLIA	TX 77354
90150	TOMI ENVIRONMENTAL SOLUTIONS, INC		9454 WILSHIRE BLVD., PENTHOUSE	BEVERLY HILLS	CA 90212
90606	DECON FORMULAS, LLC		4738 42ND AVE. NORTH	MINNAPOLIS	MN 55422
90607	MEDIZONE INTERNATIONAL, INC.	TOXCEL, LLC	7140 HERITAGE VILLAGE PLAZA	GAINESVILLE	VA 20155
90748	SPECTRASHIELD TECHNOLOGIES, LLC		4835 E. CACTUS, #320	SCOTTSDALE	AZ 85254
90920	ARTEMIS BIOPRODUCTS LLC	DELTA ANALYTICAL CORPORATION	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRINGS	MD 20904
91209	BLUETECH LABORATORIES, INC.	TECHNOLOGY SCIENCES GROUP, INC.	1150 18TH STREET N.W. SUITE 1000	WASHINGTON	DC 20036
91628	BIOSAN LLC	KRK CONSULTING LLC.	5807 CHURCHILL WAY	MEDINA	OH 44256
92013	CLEAN CHEMISTRY, INC., D/B/A CLEAN CHEMISTRY	TECHNOLOGY SCIENCES GROUP INC.	1150 181H STREET, NW, SUITE 1000	WASHINGTON	DC 20036

Signature

Name and Title:

Wendy A. McCombie,  
Agent for Brainerd Chemical Company, Inc.

Date

March 2, 2018





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Date	March 2, 2018	EPA Reg. No./File Symbol	8743-____	Page 12 of 12
Applicant's/Registrant's Name & Address: Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147		Product TERRASTAT™ 22-S		
Ingredient(s): a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
				Note

FOOTNOTES

<sup>1</sup> These studies and data gaps are identified in the environmental fate evaluation for hydrogen peroxide and peroxyacetic acid titled "Summary of Product Chemistry, Environmental Fate, and Ecotoxicity Data for Hydrogen Peroxide, Peroxyacetic Acid and Potassium Peroxymonosulfate" conducted by the Agency pursuant to the Registration Review for the Peroxy Compounds and the Final Work Plan (FWP) for Peroxy Compounds: "Peroxy Compounds Final Work Plan Registration Review," dated March, 2010.


<sup>2</sup> These studies were identified as Data Gaps in the Final Work Plan for Peroxy Compounds: "Peroxy Compounds Final Work Plan Registration Review," dated March, 2010.

<sup>3</sup> These data requirements were identified as a "data gap" in the ecological effects evaluation document ("Summary of Product Chemistry, Environmental Fate, and Ecotoxicity Data for Hydrogen Peroxide, Peroxyacetic Acid and Potassium Peroxymonosulfate") conducted by the Agency pursuant to the Registration Review for the Peroxy Compounds.

<sup>4</sup> Based on the above mentioned ecological effects evaluation document and Registration Review Summary Document, there is no indication that these data requirements are required for the peroxy compounds.

<sup>5</sup> These studies and the associated data citations, waivers and data gaps were discussed in the human health effects evaluation "Summary of Human Health Effects Data for the Peroxy Compounds Registration Review Decision Document" conducted by the Agency pursuant to the Registration Review for Peroxy Compounds.

<sup>6</sup> According to Appendix B of the 1009 Reregistration Eligibility Decision for Peroxy Compounds, the mutagenicity data requirements were waived for reregistration on the basis of the known chemical reactivity of peroxides and the effects on the biological activity of macromolecules.

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Date	March 2, 2018	EPA Reg. No./File Symbol	8743-____	Page 2 of 12	
Applicant's/Registrant's Name & Address:		Product			
Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147		TERRASTAT™ 22-S			
Ingredient(s): a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Brainerd (Co. #8743)	OWN	
			Brainerd (Co. #8743)	OWN	
			None	PL	
			None	PL	
			None	PL	
			None	PL	
			None	PL	
			None	PL	
			None	PL	
			None	PL	
			-----	DATA GAP <sup>2</sup>	
			-----	DATA GAP <sup>2</sup>	
			Evonik Corp (Co. #54289)	PAY	
			Evonik Corp (Co. #54289)	PAY	
			Evonik Corp (Co. #54289)	PAY	
			Evonik Corp (Co. #54289)	PAY	
			BASF (Co #53263)	OLD	
			BASF (Co #53263)	OLD	
			---	DATA GAP <sup>3</sup>	
			---	---	
			Solvay (EPA Co. #68660)	PAY	
			Solvay (EPA Co. #68660)	PAY	
			Solvay (EPA Co. #68660)	PAY	
			Evonik Corp (Co. #54289)	PAY	
			-----	DATA GAP <sup>2</sup>	
			-----	DATA GAP <sup>2</sup>	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			See List	PAY	
			See List	PAY	
			See List	PAY	
			See List	PAY	
			See List	PAY	
			See List	PAY	
			See List	PAY	
			Evonik Corp (Co. #54289)	PAY	
			PCTF (Co. #89390)	PAY	
			Evonik Corp (Co. #54289)	PAY	
			---	---	
			Evonik Corp (Co. #54289)	PAY	
			----	---	
			----	---	
			----	---	
			----	---	
			----	---	
			----	DATA GAP <sup>2</sup>	
			----	DATA GAP <sup>2</sup>	
			----	DATA GAP <sup>2</sup>	
			----	DATA GAP <sup>2</sup>	
			----	DATA GAP <sup>2</sup>	

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Applicant's/Registrant's Name & Address: Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147		Product TERRASTAT™ 22-S		
Ingredient(s): a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status Note

DATA SUBMITTERS: PEROXYACETIC ACID

CO.NO.	COMPANY NAME	C/O OR AGENT	STREET	CITY	STATE	ZIP
833	ALEX C. FERGUSSON LLC		5121 COFFEY AVE.	CHAMBERSBURG	PA	17201
1043	STERIS CORPORATION		PO BOX 147	ST. LOUIS	MO	631660147
1677	ECOLAB, INC.		1 ECOLAB PLACE	ST. PAUL	MN	55102
4959	WEST AGRO, INC.		11100 N. CONGRESS AVE.	KANSAS CITY	MO	64153
9402	KIMBERLY-CLARK GLOBAL SALES, LLC		2100 WINCHESTER ROAD	NEENAH	WI	54956
10324	MASON CHEMICAL COMPANY		2744 E. KEMPER RD.	CINCINNATI	OH	45241
49538	PHYTON CORPORATION	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC	20001
52252	MEDIVATORS INC	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC	20036
54289	EVONIK CORPORATION		299 JEFFERSON RD.	PARSIPPANY	NJ	07054
62432	ANTEC INTERNATIONAL LTD.	THE CHEMOURS COMPANY FC, LLC.	1007 MARKET STREET	WILMINGTON	DE	19898
63838	ENVIRO TECH CHEMICAL SERVICES, INC.		500 WINMOORE WAY	MODESTO	CA	95358
65402	PEROXYCHEM, LLC		2005 MARKET STREET, SUITE 3200	PHILADELPHIA	PA	19103
67619	CLOROX PROFESSIONAL PRODUCTS COMPANY	C/O PS&RC	PO BOX 493	PLEASANTON	CA	945660803
68660	SOLVAY CHEMICALS, INC.	LEWIS & HARRISON, L.L.C	122 C STREET, NW, SUITE 505	WASHINGTON	DC	20001
70299	BIOSAFE SYSTEMS, LLC		22 MEADOW STREET	EAST HARTFORD	CT	06108
70627	DIVERSEY, INC.		1410 NEWMAN ROAD	RACINE	WI	53406
71654	THE CHEMOURS COMPANY FC, LLC		1007 MARKET STREET	WILMINGTON	DE	19898

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147		Product TERRASTAT™ 22-S				
Ingredient(s): a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
81073	CET, LLC.	TECHNOLOGY SCIENCE GROUP, INC.	1150 18TH ST., N.W., SUITE 1000	WASHINGTON	DC 20036	
81242	YCLEAN ENTERPRISES, LLC	KILLOREN REGULATORY CONSULTING	316 HIGHLAND AVE.	HARTFORD	WI 53027	
82138	FLOCHEM, LTD.	DELTA ANALYTICAL CORP	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRING	MD 20904	
82808	AGROCHEM INC.	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH 44256	
83103	HDH AGRI PRODUCTS, LLC		27536 CR 561	TAVARES	FL 32778	
83162	AMERICAN CHEMISTRY COUNCIL	ANTIMICROBIAL EXPOSURE ASSESSMENT TASK FORCE II	700 2ND STREET, NE	WASHINGTON	DC 20002	
84545	SBIOMED, LLC	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH 44256	
85402	SPA CONCEPTS, INC		1601 APPLEWOOD WAY	TALLAHASSEE	FL 32312	
88089	BIOMED PROTECT, LLC	LANDIS INTERNATIONAL INC	PO BOX 5126 3185 MADISON HIGHWAY	VALDOSTA	GA 316035126	
89390	PEROXY COMPOUNDS TASK FORCE	C/O KELLER AND HECKMAN	1001 G STREET NW, SUITE 500 WEST	WASHINGTON	DC 20001	
91209	BLUETECH LABORATORIES, INC.	TECHNOLOGY SCIENCES GROUP, INC.	1150 18TH STREET N.W. SUITE 1000	WASHINGTON	DC 20036	
91628	BIOSAN LLC	KRK CONSULTING LLC.	5807 CHURCHILL WAY	MEDINA	OH 44256	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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WASHINGTON, D.C. 20460

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**DATA MATRIX**

Date	<b>March 2, 2018</b>	EPA Reg. No./File Symbol	<b>8743-____</b>	Page 6 of 12	
Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>		Product <b>TERRASTAT™ 22-S</b>			
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note

**DATA SUBMITTERS: HYDROGEN PEROXIDE**

CO.NO	COMPANY NAME	C/O OR AGENT	STREET	CITY	STATE	ZIP
335	ARKEMA INC.		900 FIRST AVENUE	KING OF PRUSSIA	PA	194061308
352	E. I. DU PONT DE NEMOURS AND COMPANY	ATTN: MANAGER, US REGISTRATION, DUPONT CROP PROTECTION	CHESTNUT RUN PLAZA (CRP 720/2E5), 974 CENTRE RD.	WILMINGTON	DE	19805
777	RECKITT BENCKISER LLC.	D/B/A RECKITT BENCKISER	399 INTERPACE PARKWAY	PARSIPPANY	NJ	070540225
833	ALEX C. FERGUSON LLC		5121 COFFEY AVE.	CHAMBERSBURG	PA	17201
1043	STERIS CORPORATION	STERIS	PO BOX 147	ST. LOUIS	MO	631660147
1270	ZEP, INC.	ZEP, INC. / COMPLIANCE SERVICES	3330 CUMBERLAND BLVD., SUITE 700	ATLANTA	GA	30339
1448	BUCKMAN LABORATORIES INC.		1256 NORTH MCLEAN BLVD	MEMPHIS	TN	38108
1658	HILLYARD INDUSTRIES INC		PO BOX 909	SAINT JOSEPH	MO	64502
1677	ECOLAB, INC.		1 ECOLAB PLACE	ST. PAUL	MN	55102
3573	THE PROCTER & GAMBLE COMPANY	D/B/A PROCTER & GAMBLE	5299 SPRING GROVE AVE - F&HC PS&RA	CINCINNATI	OH	45217
4170	BETCO CORP. LTD	D/B/A BETCO CORPORATION	400 VAN CAMP ROAD	BOWLING GREEN	OH	43402
4822	S.C. JOHNSON & SON INC.		1525 HOWE STREET	RACINE	WI	53403
4959	WEST AGRO, INC.		11100 N. CONGRESS AVE.	KANSAS CITY	MO	64153
5741	SPARTAN CHEMICAL COMPANY, INC.		1110 SPARTAN DRIVE	MAUMEE	OH	43537

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Applicant's/Registrant's Name & Address: <b>Brainerd Chemical Company, Inc., PO Box 470010, Tulsa, OK 74147</b>			Product <b>TERRASTAT™ 22-S</b>				
Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>							
Guideline Reference Number		Guideline Study Name		MRID Number	Submitter	Status	Note
6297	BISSELL HOMECARE, INC.	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC	20036	
8654	MEDICAL CHEMICAL CORP		19430 VAN NESS AVE.	TORRANCE	CA	90501	
9402	KIMBERLY-CLARK GLOBAL SALES, LLC		2100 WINCHESTER ROAD	NEENAH	WI	54956	
9480	PROFESSIONAL DISPOSABLES INTERNATIONAL, INC.	DELTA ANALYTICAL CORP	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRING	MD	20904	
10324	MASON CHEMICAL COMPANY		2744 E. KEMPER RD.	CINCINNATI	OH	45241	
10772	CHURCH & DWIGHT CO., INC.	LANDIS INTERNATIONAL, INC.	PO BOX 5126	VALDOSTA	GA	316035126	
16930	SOLIDS, INC.		8714 EAST 16TH STREET	KANSAS CITY	MO	64126	
45745	MIDLAB		140 PRIVATE BRAND WAY	ATHENS	TN	37303	
49058	WAYNE CONCEPT MANUFACTURING CO., INC.	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH	44256	
49158	RUG DOCTOR, LLC	SCIENTIFIC & REGULATORY CONSULTANTS, INC.	201 W. VAN BUREN STREET	COLUMBIA CITY	IN	46725	
49538	PHYTON CORPORATION	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC	20001	
49620	AKZO NOBEL PULP AND PERFORMANCE CHEMICALS INC.	KELLER AND HECKMAN LLP	1001 G STREET NW, SUITE 500 WEST	WASHINGTON	DC	20001	
52252	MEDIVATORS INC	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC	20036	
54289	EVONIK CORPORATION		299 JEFFERSON RD.	PARSIPPANY	NJ	07054	
58779	STERIS CORP		PO BOX 147	ST. LOUIS	MO	631660647	
59639	VALENT U.S.A. LLC		1600 RIVIERA AVENUE,	WALNUT CREEK	CA	945968025	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Ingredient(s): <b>a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)</b>						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
			SUITE 200			
62432	ANTEC INTERNATIONAL LTD.	THE CHEMOURS COMPANY FC, LLC.	1007 MARKET STREET	WILMINGTON	DE 19898	
63394	AMERICAN CHEMISTRY COUNCIL	ANTIMICROBIAL EXPOSURE ASSESSMENT TASK FORCE	700 2ND STREET, NE	WASHINGTON	DC 20002	
63761	STERILEX LLC, D/B/A STERILEX	LEWIS & HARRISON, LLC	122 C STREET, NW, SUITE 505	WASHINGTON	DC 20001	
63838	ENVIRO TECH CHEMICAL SERVICES, INC.		500 WINMOORE WAY	MODESTO	CA 95358	
65402	PEROXYCHEM, LLC		2005 MARKET STREET, SUITE 3200	PHILADELPHIA	PA 19103	
66045	PIPERONYL BUTOXIDE TASK FORCE II	CSPA/PIR	1667 K STREET NW, SUITE 300	WASHINGTON	DC 20006	
66607	SPRAY DRIFT TASK FORCE	MCKENNA, LONG & ALDRIDGE LLP	1900 K STREET, NW	WASHINGTON	DC 20006	
67619	CLOROX PROFESSIONAL PRODUCTS COMPANY	C/O PS&RC	PO BOX 493	PLEASANTON	CA 945660803	
68660	SOLVAY CHEMICALS, INC.	LEWIS & HARRISON, L.L.C	122 C STREET, NW, SUITE 505	WASHINGTON	DC 20001	
68959	VELTEK ASSOCIATES INC.	ATTN: PAM DESCHENES	15 LEE BOULEVARD	MALVERN	PA 193551234	
69268	ENVIROX, LLC	D/B/A ENVIROX	1938 E. FAIRCHILD STREET	DANVILLE	IL 618322327	
70299	BIOSAFE SYSTEMS, LLC		22 MEADOW STREET	EAST HARTFORD	CT 06108	
70627	DIVERSEY, INC.		1410 NEWMAN ROAD	RACINE	WI 53406	
71355	CID LINES N.V.	SCIENTIFIC & REGULATORY CONSULTANT'S INC.	201 W. VAN BUREN STREET	COLUMBIA CITY	IN 46725	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
71654	THE CHEMOURS COMPANY FC, LLC		1007 MARKET STREET	WILMINGTON	DE 19898
71871	ADVANCED STERILIZATION PRODUCTS	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC 20001
71973	UNELKO CORPORATION		14641 N. 74TH ST.	SCOTTSDALE	AZ 85260
71975	NORTHWEST AGRICULTURAL PRODUCTS		821 SOUTH CHESTNUT STREET	PASCO	WA 993023453
72032	SELSOURCE, INC.	KELLER AND HECKMAN, LLP	1001 G STREET, N.W., SUITE 500 WEST	WASHINGTON	DC 20001
72372	PEROXYCHEM, LLC		2005 MARKET STREET, SUITE 3200	PHILADELPHIA	PA 19103
72744	GREENSMITHS, INC.	D/B/A AGRI-NUTRIENTS, INC.	5201 BIRD CREEK AVENUE	PORT OF CATOOSA	OK 74015
72897	TRIOMED INNOVATIONS CORP.		40 ALLEN ROAD	SOUTH BURLINGTON	VT 05403
73817	REDOX CHEMICALS INC.		130 SOUTH 100 WEST	BURLEY	ID 83318
74436	EFT HOLDINGS INC.	D/B/A ENVIROFOAM TECHNOLOGIES	1275 ROCK CREEK CIRCLE	LAFAYETTE	CO 80026
74559	VIROX TECHNOLOGIES INC.	SCIENTIFIC & REGULATORY CONSULTANTS, INC.	201 W. VAN BUREN STREET	COLUMBIA CITY	IN 46725
74887	ANTIMICROBIAL EXPOSURE JOINT VENTURE (AEJV)	CSPA/PIR	1667 K STREET, NW, SUITE 300	WASHINGTON	DC 20006
75829	GARRISON DENTAL SOLUTIONS		150 DEWITT LANE	SPRING LAKE	MI 49456
80346	MDS HOLDINGS		PO BOX 18155	GOLDEN	CO 80402
81073	CET, LLC.	TECHNOLOGY SCIENCE GROUP, INC.	1150 18TH ST., N.W., SUITE 1000	WASHINGTON	DC 20036

Signature

Name and Title:

Wendy A. McCombie,  
Agent for Brainerd Chemical Company, Inc.

Date

March 2, 2018




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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note		
81242	YCLEAN ENTERPRISES, LLC	KILLOREN REGULATORY CONSULTING	316 HIGHLAND AVE.	HARTFORD	WI	53027	
82138	FLOCHEM, LTD.	DELTA ANALYTICAL CORP	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRING	MD	20904	
82723	KNOCK-OUT TECHNOLOGIES, LTD		387 DOVER FURNACE ROAD	DOVER PLAINS	NY	12522	
82780	PROGRESSIVE GLOBAL TECHNOLOGIES, INC.		911 KCK WAY, SUITE 1	CEDAR HILL	TX	75106	
82808	AGROCHEM INC.	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH	44256	
83103	HDH AGRI PRODUCTS, LLC		27536 CR 561	TAVARES	FL	32778	
83162	AMERICAN CHEMISTRY COUNCIL	ANTIMICROBIAL EXPOSURE ASSESSMENT TASK FORCE II	700 2ND STREET, NE	WASHINGTON	DC	20002	
84198	EARTH LABORATORIES, INC.		1101 EAST DIAMOND AVENUE	EVANSVILLE	IN	477113903	
84526	HALOSIL INTERNATIONAL, INC.	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC	20001	
84545	SBIOMED, LLC	KRK CONSULTING LLC	5807 CHURCHILL WAY	MEDINA	OH	44256	
85402	SPA CONCEPTS, INC		1601 APPLEWOOD WAY	TALLAHASSEE	FL	32312	
85837	INNOVASOURCE, LLC	KELLER AND HECKMAN, LLP	1001 G STREET, N.W. SUITE 500 WEST	WASHINGTON	DC	20001	
86381	PIMI AGRO CLEAN TECH, LTD	LEWIS & HARRISON, LLC	122 C STREET, NW, SUITE 505	WASHINGTON	DC	20001	
86729	A GROWING ALTERNATIVE, INC.		751 FAIRVIEW CHURCH ROAD	SPRUCE PINE	NC	28777	
87358	QUICK-MED TECHNOLOGIES, INC.	TECHNOLOGY SCIENCES GROUP, INC.	1150 18TH STREET, NW, SUITE 1000	WASHINGTON	DC	20036	

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
88089	BIOMED PROTECT, LLC	LANDIS INTERNATIONAL INC	PO BOX 5126, 3185 MADISON HIGHWAY	VALDOSTA	GA 316035126
89094	ASEPTIX RESEARCH BV	LEWIS & HARRISON, LLC	122 C STREET, N.W., SUITE 505	WASHINGTON	DC 20001
89390	PEROXY COMPOUNDS TASK FORCE	C/O KELLER AND HECKMAN	1001 G STREET NW, SUITE 500 WEST	WASHINGTON	DC 20001
89828	KEYLATE SOLUTIONS LLC		4833 SARATOGA BLVD. #334	CORPUS CHRISTI	TX 78413
89833	DECON7 SYSTEMS, LLC	TECHNOLOGY SCIENCES GROUP INC.	1150 18TH STREET, NW, SUITE 100	WASHINGTON	DC 20036
89883	ESSENTIAL WATER SOLUTIONS, INC	SPRING TRADING COMPANY	203 DOGWOOD TRAIL	MAGNOLIA	TX 77354
90150	TOMI ENVIRONMENTAL SOLUTIONS, INC		9454 WILSHIRE BLVD., PENTHOUSE	BEVERLY HILLS	CA 90212
90606	DECON FORMULAS, LLC		4738 42ND AVE. NORTH	MINNAPOLIS	MN 55422
90607	MEDIZONE INTERNATIONAL, INC.	TOXCEL, LLC	7140 HERITAGE VILLAGE PLAZA	GAINESVILLE	VA 20155
90748	SPECTRASHIELD TECHNOLOGIES, LLC		4835 E. CACTUS, #320	SCOTTSDALE	AZ 85254
90920	ARTEMIS BIOPRODUCTS LLC	DELTA ANALYTICAL CORPORATION	12510 PROSPERITY DRIVE, SUITE 160	SILVER SPRINGS	MD 20904
91209	BLUETECH LABORATORIES, INC.	TECHNOLOGY SCIENCES GROUP, INC.	1150 18TH STREET N.W. SUITE 1000	WASHINGTON	DC 20036
91628	BIOSAN LLC	KRK CONSULTING LLC.	5807 CHURCHILL WAY	MEDINA	OH 44256
92013	CLEAN CHEMISTRY, INC., D/B/A CLEAN CHEMISTRY	TECHNOLOGY SCIENCES GROUP INC.	1150 181H STREET, NW, SUITE 1000	WASHINGTON	DC 20036

Signature

Name and Title:

Wendy A. McCombie,  
Agent for Brainerd Chemical Company, Inc.

Date

March 2, 2018





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Ingredient(s): a) Hydrogen Peroxide (Chem. No. 595); and, b) Peroxyacetic Acid (Chem. No. 63201)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
				Note

FOOTNOTES

Signature 	Name and Title: Wendy A. McCombie, Agent for Brainerd Chemical Company, Inc.	Date March 2, 2018
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## **TRANSMITTAL DOCUMENT**

### **Submitter:**

Brainerd Chemical Company, Inc.  
PO Box 470010  
Tulsa, OK 74147

### **Company Contact:**



Typed Name of Signer: Wendy A. McCombie, Lewis & Harrison  
Phone: 202-393-3903 x111  
Fax: 202-393-3906  
Email address: wmccombie@lewisharrison.com

### **Regulatory Action in Support of Which this Package is Submitted:**

EPA Registration Number: 8743-\_\_\_\_\_ (to be assigned)  
TERRASTAT™ 22-S  
Application for Registration  
PRIA Category A540

### **Submission Dated:**

March 2, 2018

### **List of Submitted Documents:**

Volume 1

**MRID 50286900**

Administrative materials

Volume 2

**MRID 50543001**

Brainerd Chemical Company, Inc. (March 2, 2018) TERRASTAT™ 22-S: Part A Product Chemistry; Study ID: TS22S-PC001: OPPTS 830.1550, 830.1600, 830.1620, 830.1650, 830.1670, 830.1750; 6 pages with an 18-page Confidential Attachment

Volume 3

**MRID 50543002**

Brian A. Roe (February 27, 2018) Terrastat 22S: Preliminary Analysis and Enforcement Analytical Method; by Case Laboratories Inc.; Study No. 6100-04; OPPTS 830.1700 and 830.1800; 12 pages

Volume 4

**MRID 50543003**

Brian A. Roe (February 27, 2018) Physical and Chemical Characteristics of Terrastat 22S:

**DOCUMENTUM**

Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity and Relative Density; by Case Laboratories Inc.; Study No. 6100-05; OPPTS 830.6302, 830.6303, 830.6304, 830.6314, 830.6315, 830.7000, 830.7100 and 830.7300; 8 pages

Volume 5

**MRID 50543004**

Brainerd Chemical Company, Inc. (March 2, 2018) TERRASTAT™ 22-S: Part B Product Chemistry; Study ID: TS22S-PC002: OPPTS 830.6313, 830.6314, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550/7570, 830.7840/7860 and 830.7950; 6 pages

# LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, NW., Suite 505  
Washington, D.C. 20001

telephone 202.393.3903  
fax 202.393.3906

direct 202.393.3903 ext. 111  
wmccombie@lewisharrison.com

March 2, 2018

**ELECTRONIC DELIVERY**

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Document Processing Desk [APPL]  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

**ATTENTION: Zeno Bain**  
**Product Manager, Team 33**  
**Antimicrobials Division**

**SUBJECT: Brainerd Chemical Company, Inc.**  
**TERRASTAT™ 22-S, EPA Reg. No. 8743-to be assigned**  
**Application for Registration of an End-Use Product**  
**"Me-Too"/ Substantially Similar Product**  
**PRIA Code A540/\$5107 Fee**

Dear Mr. Bain:

On behalf of Brainerd Chemical Company, Inc., I am submitting an application to register an end-use product, TERRASTAT™ 22-S (EPA Reg. No. 8743-to be assigned). This product contains 22% peroxyacetic acid and 5% hydrogen peroxide as the active ingredients. TERRASTAT™ 22-S is intended for antimicrobial use in industrial and agricultural applications, and it is substantially similar in both composition and labeling to PERASAN OG (EPA Reg. No. 63838-20).

Please find enclosed the following documents to support the registration of TERRASTAT™ 22-S:

- 1) Copy of receipt for payment of PRIA fee;
- 2) Transmittal Document;
- 3) Pesticide Application Form (EPA Form 8570-1);
- 4) Basic CSF (EPA Form 8570-4);
- 5) Alternate CSF (EPA Form 8570-4), designated "HP-70";
- 6) Formulator's Exemption Statement (EPA Form 8570-27) for the Basic CSF;

**DOCUMENTUM**



- 7) Formulator's Exemption Statement (EPA Form 8570-27) for the Alternate CSF;
- 8) Proposed product label;
- 9) Certification With Respect To Citation of Data (EPA Form 8570-34);
- 10) Data Matrix (EPA Form 8570-35); and,
- 11) Each of the reports listed in the Transmittal Document.

If you have any questions, please contact me by telephone at 202-393-3903 ext. 111 or by e-mail at [wmccombie@lewisharrison.com](mailto:wmccombie@lewisharrison.com).

Thank you very much for your cooperation.

Sincerely,



Wendy A. McCombie  
For,  
Brainerd Chemical Company, Inc.

CC: Will Crimmins  
Brainerd Chemical Company, Inc.

